

# EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
MIDDLE DIVISION**

**M. H. FOX, TERESA BROTHERS, )  
and ANGELA HATCHETT, )  
Plaintiffs, )      Case No. 4:99-CV-1612-VEH  
vs. )      Case No. 4:06-CV-4676-VEH  
TYSON FOODS, INC., )      Case No. 4:06-CV-4677 -VEH  
Defendant. )**

**AFFIDAVIT OF ROBERT L. WIGGINS, JR.**

Robert L. Wiggins, Jr., first being duly sworn, deposes and states as follows:

1. I have examined the case files and the hourly time records regarding Wiggins, Childs, Quinn & Pantazis, LLC, summarized in the Itemization of Time attached hereto as Exhibit A against the background of legal standards applicable to award of attorney's fees and expenses. The facts and opinions which are contained in the balance of this affidavit are known to me in reference to such standards.

2. Reasonableness Of The Hours Expended: The hours and expenses expended on the plaintiffs' behalf for which compensation is sought are itemized in the attached Itemization of Time. The plaintiffs' attorneys and paralegals have expended approximately the following hours in this case, to date, for which compensation is sought.

Robert L. Wiggins, Jr.	1383.6
Candis A. McGowan	1453.73
Robert F. Childs, Jr.	39.25
Ann K. Wiggins	56.25
Herman N. Johnson, Jr.	6.0
Jake A. Kiser	10.68
WCQP Paralegals	491.71

3. Based on my experience in this area of law in all aspects of discovery, trial and settlement, and my familiarity with the work done in this case, the amount of time was reasonable for resolution of this case to date. The plaintiffs' attorneys were careful throughout the lawsuit to avoid duplication of time or effort and, prior to the final itemization of time for this case, reviewed all of the hours expended to assure that none of them were unreasonably duplicative.

4. Current Hourly Rates: The current hourly rate for litigation similar to that presently being considered are the following for each of the attorneys and for paralegal support involved in this matter:

Robert L. Wiggins, Jr.	\$550.00
Candis A. McGowan	\$400.00
Robert F. Childs, Jr.	\$550.00
Ann K. Wiggins	\$400.00
Herman N. Johnson, Jr.	\$350.00
Jake A. Kiser	\$200.00
WCQP Paralegals	\$110.00

5. The setting of such hourly rates by the law firm of which I am a member is based upon skill and experience in litigation and appellate practice, the economic

forces of competition in the market place, the amount of expense and the financial burden of undertaking the case, the nature and length of the professional relationship with the client, the prospect, amount and potential profitability of future employment by the client, the desirability of litigation and representation of the type involved, the preclusion of other employment due to acceptance of the case, the time limitations typical of the circumstances involved in the case, the amount of time required by the representation and the hourly rate necessary to attract us to accept the offer of employment and to undertake the representation. The applicability of these factors to the current case and the requested hourly rates are discussed in the later paragraphs of this Affidavit. The hourly rate charged is commensurate with the prevailing range of rates charged by attorneys in similar circumstances and with comparable skill and responsibility in employment discrimination litigation and similar areas of litigation in the Alabama and Birmingham legal community. See, Knight v. State of Alabama, 824 F. Supp. 1022, 1031 (N.D. Ala. 1993).

6. I am knowledgeable of the hourly rates charged by most law firms in Alabama for litigation involving comparable skill, effort, and responsibility in similar circumstances to that currently before the mediator. The hourly rates billed in the present case are consistent with the applicable range of such prevailing hourly rates. In Dillard v. City of Greensboro, (213 F. 3d. 1347 at 1355) the Eleventh

Circuit, recognized that what the attorney charges his clients is “powerful and perhaps the best evidence of his market rate...” I charge my non-contingent clients at the rate of \$550.00 per hour and \$550.00 is the hourly rate at which my uncollected time is valued by my firm in its ordinary accounting practices. Moreover, in *Dixon v. Safelite Glass Corporation*, the United States District Court for the Northern District of Alabama awarded me \$450.00 per hour three years ago. My rate has increased since then to the present rate.

7. I have examined the hourly rates of all of the attorneys set forth in Paragraph 4 above against the background of factors set forth in my affidavit and my knowledge of the prevailing market rates normally paid for attorneys with similar skills, reputation and experience in litigation of this type. Similar considerations to those set forth above support the normal hourly rates sought for all of the attorneys set forth in Paragraph 4 above. Indeed, the law firm set these normal hourly rates based on the same factors of market demand, experience, expertise, skill, ability and overall responsibility as set forth above in relation to my hourly rate. I am knowledgeable of attorneys with less experience than these attorneys being paid substantially more than the rates being sought for them herein to defend more routine, and less difficult litigation matters. For the reasons already expressed in regard to my efforts, the work undertaken in these cases on behalf of the plaintiffs warrants the

hourly rates sought herein for all of the attorneys listed in Paragraph 4 above.

8. My hourly rate and the rate of the other attorneys referenced in Paragraph 4 have increased since the fee petitions we submitted in related cases last year due to the increase in rates since then. As reflected by my reference to *Dixon v. Safelite Glass Corporation*, the rates I submitted last year in related cases matched the prevailing rates awarded in 2003. Our rates have increased since then to represent the amounts reflected in Paragraph 4.

9. The services required and provided in the current case included, in my opinion, the following features: (1) organization and efficiency in the marshaling of facts, evidence and theories of liability so that there were no wasted efforts and review of the discovery to provide useful information for the trial stage of the case; (2) a thorough comprehension of the substantive and procedural law and policy arguments necessary to efficiently present and respond to the issues raised in the case throughout the past nine years of this matter; (3) case assessment which concentrates all the energies of the services on the points which are most likely to prevail or enhance the likelihood of success and others like as related claims; and (5) a good comprehension of trial practice which minimized wasted efforts in preparing the cases for trial. Based on my knowledge of the local market for legal services, these characteristics command the requested hourly rates for comparable work in similar

circumstances to that of the current case.

10. Contingent Representation Was Necessary: The plaintiffs had very limited financial means at times during the course of this litigation. At the time that the representation was undertaken, the plaintiffs' attorneys knew from past experience in this type of case that out-of-pocket expenses would have to be paid by the attorneys with little or no prospect of reimbursement unless the case was won. It was also known at that time that such out-of-pocket expenses are for depositions, photocopy expenses, long distance phone calls, paralegal time, and other expenses associated with prosecution of this type of case. Without an attorney's willingness to accept the plaintiffs' case on a contingent basis, the plaintiffs could not have obtained representation in the current case in the local market.

11. Representation For FLSA Plaintiffs Has been Relatively Unavailable In The Local Market: I am knowledgeable of the conditions in the local market for legal services, including the availability of competent attorneys who are willing to undertake representation of plaintiffs alleging unlawful wage and hour claims under the FLSA. The availability of attorneys in the local market who are willing to undertake litigation is not the same for all types of cases. Among all types of representation offered in the local market, attorneys are the least available to plaintiffs in such employment cases. In contrast, representation of plaintiffs in personal injury

cases is readily available, and often eagerly sought, by competent attorneys in the local market. Attorneys in the local market vigorously compete to obtain personal injury through a variety of means, including direct advertising and other means of attracting such clients through various indirect marketing tools. Persons injured in ways which fall within the traditional market for legal representation are able to routinely gain such representation because the local market compensates attorneys for undertaking the risk of non-payment and financial loss involved in such representation by paying contingent fees which are far higher than the hourly rate which are charged for traditional non-contingent representation.

12. In the wage and hour field, however, there is no competition among practitioners in the local market to obtain such cases. There are very few attorneys in the local market who are willing to undertake representation of plaintiffs in wage and hour cases. Attorneys in the local market are unwilling to undertake such wage and hour cases because the fees usually awarded upon prevailing have not been sufficient to compensate for the difficulties and disruption to their practices which typically result from such cases. The fee awards in wage and hour cases in the local market have not been sufficient to attract competent counsel to undertake representation of plaintiffs in numbers adequate to fulfill the demand for such services. Consequently, it is very difficult and in many cases impossible for plaintiffs

to obtain representation in the local market for wage and hour cases.

13. The Hourly Rate Set By The Market For Other Types Of Representation Does Not Adequately Compensate For The Services Rendered In A Typical FLSA Case: The hourly rates charged in the local market for other types of services are not structured to account for the type of difficulties and disincentives encountered in this and other wage and hour cases. The effect of the factors set forth in paragraph 3 of the current affidavit and in factors 4, 5, 6, 7, 8, 10, 11 and 12 of the decision in Johnson v. Georgia Highway Express, Inc., 488 F. 2d. 714, 718 (5<sup>th</sup> Cir. 1974), necessitate the hourly rates requested in the present Petition. Hourly rates in other types of cases are structured on the assumption that payment will be received within a reasonable time promptly after billing. Clients who appear to present a risk of default on non-contingent fee billings are usually required to pay a retainer, make advanced payments or provide other security to lessen any risk of non-payment. Representation of wage and hour plaintiffs cannot be secured by such means. Consequently, the attorney accepting representation of plaintiffs in wage and hour cases is exposed to a risk of default on payment to a greater extent than the non-contingent attorney who can take steps to minimize such risk and who can curtail his representation at an early stage before too many hours are expended if default occurs.

14. Competent Counsel Need Not Accept FLSA Cases to Stay Busy:

Competent counsel in the local market can obtain sufficient employment to keep them busy without undertaking representation of plaintiffs in wage and hour cases. The attorneys in the current case had to put aside non-contingent representation of corporate and business clients in order to prosecute the current case. In the absence of the current cases, the hours expended by the plaintiff's attorneys would most likely have been expended on behalf of non-contingent fee-paying or other types of contingent clients. The risk of loss of payment of many hours to a law firm of our size is so significant that it could not be voluntarily undertaken except on exceedingly rare occasions without payment of enhanced fees which compensate for that risk and attract us to forego non-contingent representation.

15. The competition for the time of competent attorneys in the local markets is not merely between contingent and non-contingent representation, but is also, as stated above, between various types of contingent cases. Competent counsel can attract contingent representation in the local market in personal injury and other traditional contingent fee areas of practice which can consume most of their available time. In order to attract competent representation in wage and hour cases, the fees must be adequate to compete with those available in the more traditional areas of contingent representation, such as personal injury practice.

16. In short, there are sufficient alternative sources of employment for

competent counsel in the local markets which compete for the time of such counsel and which will make representation in wage and hour litigation unavailable to the majority of plaintiffs unless fees in such cases are sufficiently competitive to attract such counsel to undertake the risks and disruptions to their practices that is endemic to these cases. Fees awarded in the past have not attracted sufficient numbers of competent attorneys to undertake wage and hour cases because they have not been competitive with the fees that are otherwise available for such attorneys in other fields in the local markets. Consequently, many victims of wage and hour violations have not been able to obtain competent counsel in the relevant local markets.

17. The Acceptance Of Representation Of Employment Discrimination

Cases Has Serious Repercussions On An Attorney's Practice: The acceptance of representation of plaintiffs in wage and hour cases has a very negative effect on the financial health of a law firm because of the delay in the payment of fees and expenses in successful cases and the non-payment of fees and expenses in unsuccessful cases. Both of these facts are a necessary and inherent part of the representation of plaintiffs in wage and hour cases for all firms who accept such cases. The delay in payment often lasts from 5 to 10 years, or longer, from the time the work is done until payout, if you win, and routinely lasts 2 to 5 years. In this case, the work for the plaintiffs began in 1999. Thus, the simple payment of interest on the

award of current non-contingent hourly rates does not compensate for the disruption to the financial health to a firm from undertaking such representation; it is necessary that the fees awarded compensate for such disruptions. The same is true for any law firm which is to survive as a business.

18. Additional Aggravating Factors Inherent To Representation Of Wage and Hour Plaintiffs: In addition to the foregoing disincentives to representation of plaintiffs in the wage and hour field, there are other aggravating circumstances which serve to make such cases undesirable and which directly impact the hourly rates that are reasonable for such representation. First, such representation often leads to conflicts of interest which prevent the plaintiff's attorney from being able to represent corporate defendants who would provide non-contingent employment on a continuing basis. The law firm which represents plaintiffs must weigh the value of the representation of an individual plaintiff in a single lawsuit that is not likely to lead to further representation for that client against the possible loss of repeat business over the course of an entire career from a corporate client. Most, if not all, of the firms in the local markets who seek corporate representation refuse to accept contingent representation of plaintiffs because of the conflicts of interest that such cases cause and because of the effect on their reputation in the local markets which could cause some corporate or potential clients not to choose them as their attorney. This is part

of the risk involved in the representation of plaintiffs, i.e., the risk of losing is a definite deterrent to the ability to attract competent counsel in the local markets. Our firm has been faced with this conflict in significant matters in the past.

19. Secondly, the requirement that fee requests be reviewed by your opponent and approved by the Court or an arbitrator is an extremely undesirable feature of such cases even when successful. This factor, standing alone, is a deterrent to many attorney's willingness to handle such cases. The effort at a reduction of hours is so routine in some quarters that it appears to be almost inherent to the application of hindsight to the number of hours expended. Regardless of the cause of such reductions, the result is a deterrent to accepting contingent representation in wage and hour cases.

20. Preclusion Of Other Employment: While the representation of the plaintiffs in the three legal matters at issue here did not significantly preclude our firm from performing other legal work, it precluded me at various times during the history of this case from working on particular legal matters which I had to refer to other lawyers in our firm.

21. Undesirability Of The Case: Civil rights litigation is viewed as undesirable by most members of the bar. It is undesirable for several reasons which are applicable in this case: (1) the plaintiff almost always lacks the financial resources

to vigorously prosecute the action or pay for even routine expenses and attorney's fees; (2) many cases are lost without compensation or reimbursement for even out-of-pocket expenses; (3) considerable time can pass before any attorney's fees are even considered<sup>1</sup>; (4) acceptance of this type of case often leads to an attorney being "typecast" in the role of "civil rights" attorney and leads the community in which he works to repeatedly offer him similar work but to offer less of the more remunerative work in the traditional areas of the general practice of law; (5) many persons in the community have a strong aversion to any person who vigorously prosecutes civil rights cases or who regularly handles such cases; and (6) there are often delays in receipt of fees even after judgment is entered for the plaintiff. The most undesirable part of a civil rights case is the attorney fee phase. The plaintiff's attorney is often required to expose to the critical scrutiny of his adversary and the court every aspect of his work in a particular case. This is highly undesirable to attorneys representing a plaintiff as it requires plaintiff's attorney to call on other attorneys to examine and scrutinize his work.

22. The Nature and Length Of The Professional Relationship With The Clients: The length of the relationship with these plaintiffs is limited to this one case and is not expected to produce regular future employment by this client or others.

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<sup>1</sup> For instance, this case was initially filed in 1999.

23. The Skill Requisite To Perform The Legal Services Properly: The present case required an exertion of effort and skill greater and different than that required in the more routine provision of legal services. Specifically, the case required special familiarity with legal and factual standards unique to cases brought under the FLSA. Such skills and familiarity are not normally gained through the general practice of law or traditional legal training. The case was sufficiently difficult to litigate that it required attorneys experienced in litigation of wage and hour cases, especially in the nuances of compensable time for pre-shift and post-shift activities. Plaintiffs' counsel brought to the case specific skills gained through work on other wage and hour cases brought under the FLSA.

24. The Experience, Reputation and Ability Of The Attorneys. I am an attorney licensed to practice law in the State of Alabama. I am a graduate of the University of Alabama School of Law. I have been engaged in the practice of law for the past 35 years. I have been a shareholder in the law firm of Wiggins, Childs, Quinn & Pantazis (formally Gordon, Silberrman, Wiggins & Childs) for 23 years. My current hourly rate at Wiggins, Childs, Quinn & Pantazis is \$550.00 per hour. I am admitted to practice before the United States Supreme Court, the United States Court of Appeals for the Fifth and Eleventh Circuits, all of the United States District Courts of Alabama, and the state courts of Alabama. I have also been admitted to

practice on a pro hac vice basis in various United States District Courts for the States of Georgia and Louisiana. My practice consists primarily of representing plaintiffs in employment litigation matters, with the majority of my cases involving class action litigation in the Federal Court system.

25. Throughout my practice, I have specialized in the area of employment litigation. During this time, I have had first chair responsibility in numerous employment cases, which have proceeded to trial, summary disposition, or settlement in the Federal Court system. Some of the cases on which I have worked are: Cox, et al. v. ACIPCO, Pettway, et.al. v. ACIPCO, Osley, et.al. v. Handy City, Walker, et al. v. State of Alabama, et al., Jones, et al. v. Firestone Tire & Rubber Company, Kelly, et al. v. Bridgestone/Firestone, Inc., Celestine, et.al. v. Citgo Petroleum Corporation, Moore, et al. v. Norfolk Southern, Williams, et.al. v. CSXT, Crum, et.al. v. State of Alabama, Reynolds, et al. v. Alabama Department of Transportation, Beene, et al v. Goody's, Drake, et al v. PPG, Strong, et al v. U.S. Pipe, Yapp, et al v. Union Pacific, Morgan et al v. Family Dollar, Serena McDermott et al v. Cracker Barrel Old Country Store, Inc., NAACP et al v. Cracker Barrel Old Country Store, Inc., and Rhodes, et al. v. Cracker Barrel Old Country Store, Inc.

26. The Fee Requested: The plaintiffs, through their current attorneys, request that they be compensated for such hours at the following basis:

Robert L. Wiggins, Jr.	1383.6 hrs x \$550.00	=	<u>\$760,980.00</u>
Candis A. McGowan	1453.73 hrs x \$400.00	=	<u>\$581,492.00</u>
Robert F. Childs, Jr.	39.25 hrs x \$550.00	=	<u>\$21,587.50</u>
Ann K. Wiggins	56.25 hrs x \$400.00	=	<u>\$22,500.00</u>
Herman N. Johnson, Jr.	6.0 hrs x \$350.00	=	<u>\$2,100.00</u>
Jake A. Kiser	10.68 hrs x \$200.00	=	<u>\$2,136.00</u>
WCQP Paralegals	491.71 hrs x \$110.00	=	<u>\$54,088.10</u>
<b><u>TOTAL FEES</u></b>			<b><u>\$1,444,883.60</u></b>

27. Expense and Costs Requested: The expenses in this case are reasonable and necessary and of the kind one would expect in litigation of this type. Court reporting costs for depositions and trial transcripts, copying costs, Court filing fees, trial costs, etc., are necessary to prosecute a case of this kind.

28. The plaintiffs, through their current attorneys, request that they be compensated for the following expense amount:

Wiggins, Childs, Quinn & Pantazis, LLC Expenses = \$42,350.18

29. The plaintiffs also reserve the right to seek enhancement of normal non-contingent hourly rates for undesirability, risk, and/or other factors. Plaintiff reserves the right to supplement this petition and request additional hours necessary to complete fee petition and post-judgment work.

Robert L. Wiggins, Jr.  
ROBERT L. WIGGINS, JR.

Sworn to and subscribed before me this the 16<sup>th</sup> day of June, 2008.

NOTARY PUBLIC Diane J. Ferguson  
MY COMMISSION EXPIRES: 11-14-08

NOTARY PUBLIC STATE OF ALABAMA AT LARGE  
MY COMMISSION EXPIRES: Nov 14, 2008  
BONDED THRU NOTARY PUBLIC UNDERWRITERS

# EXHIBIT “A”

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**017788-0004      Fox, M. H.**  
**Attorney Fees**

Date	Atty	Description	Hours
<i>Wiggins, Robert L.</i>			
1/31/2007	RLW	Prepare for and attend conference call with co-counsel (Bob Childs and Candis McGowan); study orders and opinions in case relevant to M. H. Fox's individual claims; read M. H. Fox's depositions; era cases on legal standards applicable to individual don/doff claims	9.50
2/6/2007	RLW	Prepare for teleconference, review materials from Candis	1.00
2/7/2007	RLW	Meet with Candis; attend teleconference; draft long e-mail to Joe and Christine; prepare individual case task list	3.50
2/9/2007	RLW	Meet with Candis to apportion work; conference call with co-counsel; meet with Bob Childs, Rusty Johnson and Candis McGowan on work to be done; revise task list; finish reading Fox's deposition; outline issues/work to be done from deposition	6.00
2/9/2007	RLW	Meeting on trial prep and responsibilities; review status of discovery; read depositions	2.80
2/10/2007	RLW	Read depositions to determine trial prep and discovery issues	4.00
2/11/2007	RLW	Read depositions and discovery to plan trial preparation	3.50
2/12/2007	RLW	Outline trial prep; outline client's facts	5.20
2/13/2007	RLW	Read depositions and outline trial prep issues	3.70
2/14/2007	RLW	Conference with co-counsel on work to be done and issues in case; outline part of facts and issues	2.20
2/20/2007	RLW	Review status of discovery; outline trial issues needing further work	2.00
2/26/2007	RLW	Identify potential witnesses; try to find witnesses; outline facts; witnesses needed for and persons to contact; talk to Candis about witnesses; read plant HR deposition	5.50
4/24/2007	RLW	Review and outline discovery to date; outline further discovery needed; draft 30(b)(6) deposition notice; identify supervisors that need to be deposed; draft deposition notices; discuss trial prep work to be done with co-counsel; draft several e-mails on work to be done	8.50

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**017788-0004      Fox, M. H.**  
**Attorney Fees**

Date	Atty	Description	Hours
<i>Wiggins, Robert L.</i>			
4/25/2007	RLW	Meeting on trial prep with co-counsel; further review of discovery and documents produced to date by Tyson	5.50
6/27/2007	RLW	Several meetings on trial prep with co-counsel; outline witnesses needed for trial	2.50
8/6/2007	RLW	Reviewed Tyson's summary judgment motion for reconsideration and materials; read original orders/opinions on summary judgment; re-read Cagle's opinion on Section 3(o); outline points of reply on summary judgment	4.60
8/7/2007	RLW	Continue work on summary judgment issues	2.00
8/13/2007	RLW	Study Cagle's effect on Fox's claim; draft position; draft e-mail to Christine on Section 3(o) argument and summary judgment; review Rusty Johnson's Section 3(o) response	3.00
8/15/2007	RLW	Study draft of summary judgment brief and e-mails on Section 3(o) effect of Cagle's and what will still be left for trial if granted; draft e-mails on Section 3(o) arguments	2.50
8/16/2007	RLW	Review draft of brief opposing summary judgment; look further at Section 3(o) issue	1.30
8/21/2007	RLW	Several meetings on trial prep and division of labor for trial prep; prepare for pretrial conference; outline issues for pretrial order	5.30
8/27/2007	RLW	Review defendant's summary judgment reply; outline oral argument points; prepare for pretrial	3.00
8/29/2007	RLW	Meeting on trial prep and pretrial conference issues; prepare for court conference	3.00
8/30/2007	RLW	Meeting in preparation for pretrial conference and trial preparation; work on trial prep; outline division of labor/things to be done	2.00
8/30/2007	RLW	Prepare for oral argument discuss with Christine and Candis	1.80
9/6/2007	RLW	Prepare for oral and attend pretrial conference; outline results of pretrial conference and work that needs to be done; read Tim McCoy deposition and outline useable parts	6.20
9/7/2007	RLW	Outline witnesses and documents to be used at trial; review discovery	4.00

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**017788-0004      Fox, M. H.**  
**Attorney Fees**

Date	Atty	Description	Hours
<i>Wiggins, Robert L.</i>			
		document production for possible trial exhibits; meeting on trial prep; e-mails on various issues	
9/8/2007	RLW	Read and outline useable parts of Whitney Wilson deposition; read and outline Serrano deposition for possible designations	8.30
9/9/2007	RLW	Read and outline possible deposition designations from Schneider; study expert reports of both parties; outline useable parts	9.20
9/10/2007	RLW	Read and outline Dr. Fernandez deposition and report for defendant for possible trial designations and/or cross/exam at trial	12.20
9/13/2007	RLW	Continue work on Dr. Fernandez' deposition and cross-exam outline and possible deposition designations; read and outline depositions of defendants' officials for designations on pages pursuant to pretrial order	8.50
9/15/2007	RLW	Read and outline depositions of defendants' officials and expert in order to decide what pages to designate/counterdesignate for trial	6.40
9/17/2007	RLW	Meeting on trial prep; continue trial prep	2.50
9/19/2007	RLW	Meeting on trial prep	1.00
9/20/2007	RLW	Meeting on trial prep and witnesses/document lists and other due dates	2.10
10/2/2007	RLW	Outline Jerry Phillips' deposition as part of trial exam; outline for Phillips; meeting with co-counsel on trial prep	6.80
10/3/2007	RLW	Research and draft jury instructions and various motions in limine issues; study and outline defendant's position in pretrial order; draft e-mail; trial prep; meeting with co-counsel on trial prep	10.70
10/4/2007	RLW	Outline Phillips' deposition and cross-exam outline; work on jury instructions and various motions in limine; meeting on trial prep	12.00
10/5/2007	RLW	Continue trial exam; outlines; integrate documents/exhibit references into outlines work on jury instructions and motions in limines; e-mails to and from Tyson's counsel; trial prep meeting	11.40
10/6/2007	RLW	Read and outline defendant's depositions; continue work on Phillips' exam outline; outline useful exhibits; study backpay calculations; overall trial prep	9.00

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**017788-0004      Fox, M. H.**  
**Attorney Fees**

Date	Atty	Description	Hours
<i>Wiggins, Robert L.</i>			
10/7/2007	RLW	Trial prep; outline Phillips' deposition and trial exam areas; outline Roderick Jackson's deposition	7.40
10/8/2007	RLW	Continue work on trial exam outline of Jerry Phillips; work on Roderick Jackson's deposition and exam outline; study collective bargaining agreement; meeting on motion in limine and jury instructions; teleconference with defense counsel; meet with co-counsel on trial prep issues; draft and respond to various e-mails on trial prep issues	13.30
10/9/2007	RLW	Continue trial prep and witness exam outlines; work on jury instructions and motions in limine; study DOL regulations	12.50
10/10/2007	RLW	Talk to clients; talk to potential witnesses; work on motions in limine; draft jury instructions from review of DOL regulations; draft and respond to various e-mails; outline direct exams of clients; outline new parts of Jerry Phillips exam; study D'Ascencio transcript and outline parts	13.50
10/11/2007	RLW	Continue work on motion in limine and jury instructions; teleconference with co-counsel; study parts of D' Asencio transcripts; continue work on trial witness cross-exam outlines	9.50
10/12/2007	RLW	Re-draft and respond to defendant's proposed jury instructions; discuss jury instructions with other counsel; draft and edit motions in limine and various e-mails; overall trial prep; read some of cases cited by defendant on jury instructions	13.00
10/13/2007	RLW	Revise and respond to jury instructions; study defendant's motion in limine; outline response to defendant's motions in limine; continue trial prep; outline direct exam of potential witnesses; prepare for Dr. Fernandez cross-exam.; work on backpay calculations; outline parts of defendant's exhibits; study plaintiff's punch-in/punch-out records; outline potential problem areas in client's depositions; work on jury instructions again	12.00
10/14/2007	RLW	Revise jury instructions in light of communications with defendant counsel; continue work on trial witness exam outlines; study punch-in/punch-out records for use at trial	10.60
10/15/2007	RLW	Revise outlines for trial; review response on motions in limine; outline points of reply on motions in limine; review version of jury instructions sent to court; draft revised motion in limine on Harper/Roden 30(b)(6) issue in light of defendant's brief on that issue; outline cross-exam of Phillips as Company spokesman; meeting on trial prep; continue overall trial prep	13.20

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

017788-0004      Fox, M. H.  
**Attorney Fees**

Date	Atty	Description	Hours
<i>Wiggins, Robert L.</i>			
10/16/2007	RLW	Work on Phillips' cross-exam outline; outline direct exam topics for plaintiffs; overall preparation for trial on all three cases; meetings with co-counsel on trial prep issues	13.80
10/17/2007	RLW	Continue trial preparation and cross-exam outlines; several meetings on trial preparation; work on demonstrative exhibits; review parts of videotapes and defendant's orientation DVD	12.70
10/18/2007	RLW	Work on Fernandez' cross exam outline; work on witnesses cross-exam outline based on various exhibits and deposition extracts; work on punch-in/punch-out records for use at trial; overall trial prep; work on courtroom electronics and slide show; draft and respond to e-mails; study motions in limine brief and responses; study defendant's trial exhibits; draft demonstrative exhibit disclosure; work on demonstrative exhibits	13.00
10/19/2007	RLW	Revise motions in limine; continue trial prep and review of defendant's trial exhibits; draft objection to defendant's expert and motion to exclude; teleconference with court; respond to court's orders and requests entered from teleconference; review items being submitted to court; work on electronic aspects of blow-ups; revise parts of cross-exam outline of Phillips	14.20
10/20/2007	RLW	Work on cross-exam outlines; get exhibit blow-ups; several teleconferences with defense counsel; meeting with co-counsel on trial prep; rework direct exam outlines; draft opposition to defendant's demonstrative exhibits; further review of defendant's trial exhibits	10.00
10/20/2007	RLW	Meet with M. H. Fox in preparation for trial	3.00
10/21/2007	RLW	Work on electronic presentation of trial exhibits and deposition extracts; meet with Kim Hooks on trial exhibits and Phillips' deposition extracts; revise and edit trial exam outlines for Jerry Phillips; draft various e-mails; draft opening statement outline; work on direct exam points for Fox	8.00
10/21/2007	RLW	Draft various e-mails; draft opening statement outline; work on direct exam points for Fox	5.50
10/22/2007	RLW	Prepare for and attend trial; meet with client; meet with witnesses; work on opening statement; prepare for second day of trial	15.00
10/23/2007	RLW	Prepare for and attend trial; work on trial prep issues at night	14.00
10/24/2007	RLW	Prepare for and attend trial	8.00

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**017788-0004      Fox, M. H.**  
**Attorney Fees**

Date	Atty	Description	Hours
<i>Wiggins, Robert L.</i>			
10/25/2007	RLW	Prepare for and attend mistrial conference; teleconference with Christine; meet with M. H. Fox and son about mistrial and retrial	4.50
1/2/2008	RLW	Conference on trial preparation; possible settlement, etc.; outline work needed for retrial	1.20
1/3/2008	RLW	Conference on retrial and discussion with Mike Mueller; pull retrial materials together	0.50
1/7/2008	RLW	Review motion on trial continuance from Candis; review transcript, witness lists etc; to determine work needed for new trial	2.20
1/9/2008	RLW	Edit motion on trial continuance	0.20
1/10/2008	RLW	Discuss trial preparation in light of denial of motion to continue; outline trial transcript for use in cross-exams at new trial	7.50
1/14/2008	RLW	Review Tyson's withdrawals of defenses; continue trial prep update and outline of trial transcript for renewed cross-exam; work on M. H.'s time records for de minimis and time shaving examples	5.70
1/15/2008	RLW	Continue trial prep and transcript outlines from first Fox trial and common witnesses who testified in other two trials	4.00
3/27/2008	RLW	Review offer of judgment; discuss with co-counsel; check back-pay calculation	0.50
3/31/2008	RLW	Review acceptance of offer of judgment; check on back-pay calculation and fees/expense records	0.50
4/10/2008	RLW	Review fee/costs rule and fee expense records	0.50
4/11/2008	RLW	Go through time records to eliminate unrelated time and to check accuracy and completeness; draft e-mail to other counsel about Monday's deadline for fee petition; draft motion for fees; calculate fees	7.50
<b>Total</b>			<b>461.20</b>

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**017788-0004      Fox, M. H.**  
**Attorney Fees**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
1/31/2007	CAM	Voice mail to Joe regarding conference call today; telephone call with Bob Wiggins regarding his availability for a conference call today; telephone call from Joe's secretary regarding scheduling conference call; telephone call to Bob Wiggins regarding time for conference call today; editing and filing Notice of Change of Address; conference call with Joe Sellers, Bob Wiggins, and Bob Childs regarding Fox claims in Alabama, work assignments, possible additional claims, etc	1.60
2/6/2007	CAM	Preparing information for Childs and Wiggins for use in conference call	0.80
2/7/2007	CAM	Receipt of email from Joe regarding changing time of call; telephone call with Christine regarding call in number; telephone call with Joe regarding confirming time for the call; conference call with Joe, Christine, Wiggins, and Childs regarding Alabama cases, how to handle, etc	1.50
2/9/2007	CAM	Telephone call from Joe regarding meeting today, what needs to be done in different states, etc; conference call with co-counsel regarding legal assignments and legal strategies, settlement offers, etc	2.50
2/14/2007	CAM	Conference with co-counsel on issues in case and work assignments	0.80
2/16/2007	CAM	Receipt of email from Christine's office with contact information for M. H. Fox	0.20
2/20/2007	CAM	Receipt of copy of Christine's letter to M.H. Fox	0.20
4/23/2007	CAM	Conference with Bob Wiggins regarding depositions of supervisors; telephone call with Mike Mueller regarding need dates to depose supervisors, his position is no, etc; conference with Bob Wiggins regarding Mueller's response, noticing depositions, etc.	0.50
4/25/2007	CAM	Meeting with Co-counsel on discovery needed and trial preparation	0.80
5/8/2007	CAM	Receipt of email from Evangeline regarding not coming to depositions; telephone call from David Smith regarding not involved with depositions;	0.50
6/25/2007	CAM	Receipt of Notice of Change of Address for Jay Gilden in the three Albertville cases	0.20
6/27/2007	CAM	Meeting with co-counsel on trial preparation	1.50

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

017788-0004      Fox, M. H.  
**Attorney Fees**

Date	Atty	Description	Hours
<b><i>McGowan, Candis</i></b>			
9/7/2007	CAM	Conference with Bob Wiggins regarding call with Joe, ruling in De Asencio, trial, witnesses, etc	0.30
10/4/2007	CAM	Conference with Bob Wiggins regarding trial preparation in Fox and objections by Tyson	0.30
10/4/2007	CAM	Telephone call with Christine regarding our objections and Tyson's objections in Fox	0.30
10/4/2007	CAM	Conference call with Christine, Mueller and David Smith regarding meet and confer on Fox objections	1.50
10/4/2007	CAM	Telephone conference with Christine on outstanding objections	0.20
10/8/2007	CAM	Receipt of email from Bob regarding pre-shift claims in Fox	0.10
10/8/2007	CAM	Receipt of reply email from Christine	0.10
10/8/2007	CAM	Voice mail from David Smith regarding questions about Fox case	0.10
10/8/2007	CAM	Receipt of email from Christine regarding draft of Objections for Fox case to file with the Court	0.10
10/8/2007	CAM	Voice mail to David Smith	0.10
10/8/2007	CAM	Voice mail from David Smith regarding issue of other trial and need for additional counsel to make appearance	0.10
10/9/2007	CAM	Receipt of email from Christine regarding our objections to Tyson's Counter-Deposition Designations in Fox and checking the same	0.20
10/9/2007	CAM	Telephone call with Christine regarding our objections, conference call yesterday, email to Mueller with Counter Deposition Designations, etc.	0.20
10/9/2007	CAM	Receipt of email from Christine with final draft of Fox's Unresolved Objections	0.10
10/9/2007	CAM	Editing Fox's Unresolved Objections	0.30
10/9/2007	CAM	Receipt of copy of Christine's email to Mueller with our Counter-Deposition Designations in Fox	0.10

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

017788-0004      Fox, M. H.  
**Attorney Fees**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
10/9/2007	CAM	Receipt of Tyson's Unresolved Objections in Fox	0.20
10/9/2007	CAM	Receipt of e-filed Unresolved Objections in Fox	0.10
10/16/2007	CAM	Fox Trial preparation - Prepare trial exhibit notebooks -- conference with Rhett regarding subpoenas	0.80
10/17/2007	CAM	Preparing for Fox trial; voice mail from witnesses; telephone call with M.H. Fox regarding appointment, to prepare, etc.; conference with Bob regarding witness order, stipulated facts, etc.; editing proposed stipulation of additional facts and conference with Bob Wiggins on the same; voice mail from Janette Masters regarding witness information; telephone call from Nathan Fox regarding facts and issues for testimony, etc.; receipt of Order on Motions on Limine; telephone conference with Christine regarding Order and meet and confer meeting with Mueller, etc.; meeitng with Bob Wiggins and M.H. Fox to prepare for trial; telephone call with Janette Masters regarding witness information, etc.; updating outline for Fox's testimony	9.00
10/18/2007	CAM	Trial preparation; telephone call to witnesses; telephone conference with process server; telephone conference with Janette Masters regarding her deposition transcript; telephone call to Robert Alexander regarding exhibits from Masters deposition; telephone call with process server regarding witnesses, location information; telephone call with Cecil regarding witness information; conference call with Bob Wiggins regarding trial preparation and witness order; receipt of Mueller's email to Judge regarding defenses withdrawn; telephone call with Bob Wiggins to Mueller regarding exchanging of demonstrative exhibits; receipt of Mueller's demonstratives by email; preparing outlines for trial testimony	8.30
10/19/2007	CAM	Preparing for Fox trial; conference call with Judge Hopkins and all counsel; call to Mueller regarding deposition transcripts for the court; reviewing trial exhibits; receipt of Order on conference call; preparing exhibits for the Court; working on trial exhiits and witness outlines; conference with IT people; telephone call from witnesses; deposition, etc; receipt of Order on withdrawal of defenses; reviewing exhibits Tyson is withdrawing	11.20
10/20/2007	CAM	Trial preparation; receipt of Court's orders, complying wtih orders; meeting with witnesses; conference call with defense counsel; receipt of various emails from defense counsel; receipt of Orders on Motions in Limine and Objections; drafting witness outlines; conference with Bob Wiggins regarding trial strategy; receipt of various pleadings filed by Tyson	16.80
10/21/2007	CAM	Preparing for trial; meeting with witness; telephone call with witnesses; receipt and review of Orders to prepare exhibits; conference with Bob Wiggins	12.60

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**017788-0004      Fox, M. H.**  
**Attorney Fees**

Date	Atty	Description	Hours
<b><i>McGowan, Candis</i></b>			
		regarding trial strategy; preparing for Voir Dire; removing exhibits, working on damages for Plaintiff	
10/22/2007	CAM	Preparing for and attending first day of trial in Fox; preparing for second day of trial; telephone calls with various witnesses; telephone call with Christine regarding expert witnesses opposition; telephone call with Teresa Brothers work number and trial preparation; receipt of pleadings filed in Brothers; receipt of pleadings filed in Hatchett; receipt of e-filed Brief in Fox filed by Christine; telephone call to Doolittle regarding rebuttal witness; conference with Bob Wiggins regarding trial preparation for tomorrow	15.30
10/23/2007	CAM	Preparing for trial; attending second day of trial; telephone call with witnesses; telephone conference with Joe Sellers regarding status; telephone call with Christine regarding research and status; telephone call with Roger regarding rebuttal witnesses; telephone call with Dan Bartel regarding information for rebuttal; telephone call with Greg Stalling regarding information for rebuttal; preparing for 3rd day of trial; conference with Bob Wiggins regarding mistrial and witnesses, trial strategy, etc	17.30
10/24/2007	CAM	Preparing for and attending 3rd day of Fox trial; meeting with witnesses, telephone calls to witnesses regarding trial is continued, no trial tomorrow; telephone call to Judge's clerk, regarding status of Mr. Fox's medical condition; telephone call with Bob Wiggins regarding results of his conference call with the Judge and defense counsel; preparation for Brothers, etc.; telephone conference with Bob Wiggins regarding strategy for trial, positions for tomorrow, etc.; conference call with Joe and Christine regarding strategy, etc.; telephone call with Roger Doolittle regarding witnesses; telephone call with Nathan Fox regarding fathers' status; receipt of email from Christine regarding law; editing law for Bob Wiggins	13.10
10/25/2007	CAM	Preparing for and attending 4th day of trial in which the Judge declared a mistrial	5.00
12/28/2007	CAM	Receipt of Order setting case for trial; drafting email to Bob regarding trial date	0.20
1/2/2008	CAM	Conference with Bob Wiggins regarding trial setting order and contacting Mueller about jointly moving to continue case, etc.; drafting email to Christine regarding trial setting; telephone call with Mueller regarding receipt of email from Christine regarding trial setting; jointly moving Court to continue trial until after Brothers and Hatchett appeal, possibility of settling case, etc.; drafting email to Bob Wiggins, Joe Sellers and Christine Webber regarding results of conversation with Mueller; telephone call with Christine regarding new trial date and conversation with Mueller, etc.; telephone call to M.H. regarding new	1.20

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**017788-0004      Fox, M. H.**  
**Attorney Fees**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		trial date, his health, status, his issues with trial, etc.	
1/3/2008	CAM	Conference with Bob regarding call with M.H. Fox and his concerns about new trial date, my call with Mueller, etc.; receipt of filing of transcripts by Court Reporter	0.40
1/7/2008	CAM	Voice mail from Mueller regarding Tyson does not oppose Motion to Continue trial date; voice mail to Mueller regarding motion; drafting email to Bob Wiggins, Joe and Christine regarding Tyson's position on not opposing Motion to Continue Trial; conference with Bob Wiggins regarding Motion to Continue; Tyson's position; his thoughts on grounds for same, etc.; drafting Motion to Continue Trial Date; telephone call with Mueller regarding Motion to Continue, grounds in motion; reasons for Tyson's position, etc.; editing Motion to Continue; telephone call from Christine regarding additional grounds for Motion to Continue, etc.; drafting email to Bob Wiggins and Christine regarding draft of Motion to Continue for their review	2.10
1/8/2008	CAM	Receipt of email from Christine regarding her changes to Motion to Continue Trial Date; drafting reply email to Christine regarding status of filing Motion to Continue	0.10
1/9/2008	CAM	Conference with Bob Wiggins regarding his changes to Motion to Continue Trial; editing Motion to Continue Trial; drafting email to Mueller regarding Motion to Continue Trial for his review; receipt of email from Mueller regarding will talk to client and let me know their position; receipt of email from Mueller regarding he and client have no problems with language in motion; conference with Katrina regarding efilng Motion; receipt of e-filed Motion to Continue Trial	1.10
1/10/2008	CAM	Receipt of Order denying Motion to Continue Trial; conference with Bob regarding Order; telephone call to M.H. regarding his needs to get an excuse from his doctor to refile Motion; telephone call from M.H. regarding status of obtaining doctor's excuse; receipt of email from Christine regarding Order; drafting reply email to Christine regarding Order and call with M.H.; telephone call from M.H. regarding information from his doctor and health issues he is now having; drafting email to Bob and Christine regarding information from M.H.; research on Pro Hac Vice issue	1.40
1/11/2008	CAM	Receipt of email from Christine regarding information on M.H. and his medical condition; telephone call with Christine regarding trial status, no new witness list, etc.; telephone call with Bob Wiggins regarding information from M.H.; telephone call to M.H. spoke with his mother regarding current medical condition of M.H.; telephone call with Bob Wiggins regarding witness for use in trial	0.90

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

017788-0004      **Fox, M. H.**  
**Attorney Fees**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
1/14/2008	CAM	Telephone call to M.H. regarding status of obtaining doctor's excuse name and phone number for doctor, etc.; trial date, etc.; receipt of Notice of Withdrawing Willfulness and Good Faith defenses by Tyson; conference with Bob Wiggins regarding withdrawal of defenses filed by Tyson; receipt of email from Christine regarding the defenses Tyson withdrew	0.80
1/15/2008	CAM	Telephone call to M.H. doctor's office regarding doctor's excuse needed for trial date, etc.; telephone call to M.H. - left message with his Mom for him to call his doctor and me; conference with Bob regarding telephone call with M. H. last night, defenses withdrawn by Tyson, Motion in Limine, etc.; checking on previous order on defenses withdrawn by Tyson; conference with Bob regarding Oct. 19th Order withdrawing work defense and Portal-to-Portal Act defense, Motions in Limine to file, etc.; drafting email to Bob regarding due date for Motions in Limine; telephone call with M.H. regarding information from his doctor, his current condition, trial date, etc	1.30
1/16/2008	CAM	Conference with Bob regarding information from M. H. on his doctor in Anniston, etc	0.10
1/17/2008	CAM	Telephone call with Christine regarding information from M.H. Fox; voice mail to Nathan Fox regarding trial date; voice mail from Mueller regarding re-filing Motion to Continue; conference with Bob Wiggins regarding voice mail from Mueller and information from M.H.; voice mail to Mueller regarding status of re-filing Motion to Continue	0.60
1/18/2008	CAM	Voice mail from Nathan Fox regarding trial date; telephone call to Nathan regarding trial date, his father's medical condition, need for doctor's excuse, etc.; receipt of email from Mueller regarding they will not oppose a Renewed Motion to Continue Trial; drafting reply email to Mueller regarding talking next week to discuss trial issues; preparing for trial by reviewing trial transcript	1.90
1/22/2008	CAM	Voice mail to Nathan regarding trial date; voice mail from Mueller regarding Motion to Continue based on medical reasons; conference with Bob regarding Mueller's message; voice mail to Mueller regarding call to discuss matter; telephone call from Mueller regarding Tyson will not oppose a Re-newed Motion to Continue if based on medical reasons and filed by next Monday, status of Fox seeing doctors, etc.; drafting email to Christine regarding call with Mueller; receipt of reply email from Christine regarding questions from call with Mueller; drafting reply email to Christine regarding responding to her questions	1.00
1/23/2008	CAM	Telephone call with Christine regarding status of trial preparations, etc.; telephone call to M. H. Fox regarding status of his health, trial preparations, etc.; conference with Bob Wiggins regarding information with M. H., sending	2.10

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

017788-0004      Fox, M. H.  
**Attorney Fees**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		Jake to meet with M. H. and doctor, etc.; conference with Jake regarding issues at last trial and meeting with M. H.; conference call with Jake and M. H. regarding meeting tomorrow, what Jake needs, etc.; preparing documents for Jake's meeting with M. H.; telephone call from M. H. regarding confirming meeting; preparing for trial	
1/24/2008	CAM	Conference with Jake regarding results of meeting with M. H. and reviewing copy of doctor's excuse; drafting Renewed Motion to Continue; drafting email to Christine and Bob regarding drafting motion; receipt of email from Christine regarding her changes to Motion; editing Motion to Continue; drafting email to Mueller regarding proposed Motion to Continue; drafting email to Mueller regarding whether he opposes Motion to Continue; receipt of email from Mueller regarding no Opposition to Motion; receipt of e-filed Motion to Continue; receipt of copy of email to Judge Hopkins regarding copy of Motion to Continue; receipt of email from Mueller regarding possible Motions in Limine; drafting email to Christine regarding Mueller's request on Motion in Limine; receipt of reply email from Christine on Mueller's request	1.50
1/28/2008	CAM	Receipt of Order granting Continuance of the trial; conference with Bob regarding motion granted; receipt of email from Christine regarding continuing the trial; receipt of Order resetting trial from March 3, 2008; drafting email to Bob and Christine with new trial dates	0.50
1/29/2008	CAM	Telephone call with Christine regarding Judge's order resetting trial date, etc.; conference with Bob Wiggins regarding new trial date; conference with Jake regarding assignments for trial issues	0.60
1/31/2008	CAM	Telephone call with Mueller regarding problems with his witness having another stroke, whether Fox's health will be ready for trial, etc.; voice mail from Bob regarding his thoughts on Mueller's requests for limiting trial testimony; receipt of email from Mueller regarding potential Motion in Limine for trial and our position on the same; receipt of Bob's email to Christine on Mueller's request; receipt of Christine's response; conference with Bob regarding Mueller's request on Motion in Limine subjects, receipt of Bob's email to Mueller with our position on subjects to avoid in trial and use of transcripts, receipt of Mueller's email agreeing to our proposal on use of transcripts; telephone call with Christine regarding telephone call with Mueller regarding witness having another stroke, etc.	1.30
2/1/2008	CAM	Conference with Bob Wiggins regarding information from Mueller on witness for Tyson, Dennis Harper, having a stroke, etc.; telephone call with Christine on information from Mueller on Harper, etc.	0.40
2/7/2008	CAM	Telephone call with Jake regarding instructions for meeting with M.H. Fox;	0.60

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**017788-0004      Fox, M. H.**  
**Attorney Fees**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		receipt of Judge's Order on Leading Questions; receipt of Order on Redacting Personal Information	
2/8/2008	CAM	Conference with Jake regarding information to cover in meeting with M.H.	0.30
2/11/2008	CAM	Conference with Jake regarding medical information on M.H. Fox and drafting Motion to Continue; conference with Bob Wiggins regarding Medical information on M.H.; receipt of email from Jake with draft of Motion to Continue and editing the same; telephone call to Mueller regarding Tyson will not oppose Motion, may join in motion due to Harper's stroke	1.20
2/12/2008	CAM	Editing Motion to Continue New Trial Date; conference with Bob regarding his changes to Motion to Continue; telephone call to Mueller regarding Tyson's position on Motion to Continue, will call tomorrow with position on whether to join Motion due to Harper's stroke, etc.; conference with Bob regarding information from Mueller; making additional corrections to Motion to Continue; drafting email to Christine with copy of Motion to Continue for her review	1.20
2/13/2008	CAM	Receipt of email from Christine regarding suggested changes to Motion to Continue; conference with Bob regarding Motion to Continue; telephone call to Mueller regarding whether Tyson is going to join Motion; voice mail from Mueller regarding Tyson is not opposing motion, but is not joining it; editing and executing Motion for efilng; receipt of copy of Katrina's email to Judge Hopkins with courtesy copy of Motion; voice mail from clerk's office, Joseph Colvin; telephone conference with Colvin regarding need to file Motion to Seal Exhibit A; receipt of email from Mueller regarding Exhibit A is missing; drafting email to Mueller with Exhibit A; drafting Motion to File Exhibit A under seal and proposed Order; receipt of Order granting Motion to Continue and setting new trial date; receipt of efiled Motion to Seal; receipt of email from Christine; Order continuing trial; conference with Bob Wiggins regarding new trial date; telephone call from Christine regarding new trial date, etc	2.60
2/14/2008	CAM	Receipt of Order granting Motion to File Medical Records Under Seal.	0.10
2/15/2008	CAM	Telephone call from M.H. Fox regarding Motion to Continue Trial granted, new trial date, etc	0.30
3/18/2008	CAM	Receipt of email from Court Reporter regarding daily copy for trial	0.10
3/26/2008	CAM	Voice mail from M.H. Fox regarding information for trial; telephone call to M. H. Fox regarding information for case, his health status, etc.; voice mail to Jake regarding contacting M. H.; receipt of email from Jake with detailed information from M. H.; telephone call with Bob Wiggins regarding information	0.70

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**017788-0004      Fox, M. H.**  
**Attorney Fees**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		from M. H., his health status, etc.	
3/27/2008	CAM	Receipt of email from David Smith with letter and Offer of Judgment in case; telephone call to Bob Wiggins regarding Offer of Judgment, position on same; receipt of Christine's email regarding her position on Offer of Judgment; telephone call to Christine regarding offer, advice for M. H. Fox, etc.; I will contact M.H.; voice mail to M. H. Fox regarding Tyson has made a settlement offer	0.90
3/28/2008	CAM	Voice mail to M. H. Fox regarding call about settlement offer; telephone call to Jake regarding telephone number for M. H.'s mother; attempting to reach M. H. at his mother's number and on his cell phone - no answer; voice mail to Jake regarding contact M. H. and schedule time for me to call him today; voice mail from Jake regarding he has schedule a call with M. H. and me for 3:30 p.m.; conference call with Roger Doolittle and M. H. regarding Tyson's settlement offer and authority to accept; conference call with Roger and Bob Wiggins regarding M.H. said accept settlement offer	1.00
3/31/2008	CAM	Conference with Bob Wiggins regarding accepting Offer of Judgment, etc.; drafting Acceptance of Offer of Judgment; reviewing requirements of Rule 68; telephone call to David Smith regarding accepting offer; drafting letter to David Smith regarding Offer of Judgment accepted; executing Acceptance for e-filing; receipt of e-filed Acceptance and e-filed Offer of Judgment; receipt of email from Christine regarding fee petition; drafting reply email to Christine regarding fee petition	2.20
5/8/2008	CAM	Receipt of email from Mueller with Preliminary Objections to our Request for Fee Petition; receipt of email from Christine regarding her thoughts on Tyson's objections; receipt of Bob Wiggins' reply email to Christine regarding Motion to Compel; conference with Bob Wiggins regarding objections; drafting email to Christine regarding Fee Petition and amending the same	0.80
5/9/2008	CAM	Receipt of email from Mueller regarding Alabama tax forms for Fox to sign; receipt of Christine's email regarding Motion to Compel	0.20
5/10/2008	CAM	Receipt of email from Mueller regarding status of Motion to Compel; forwarding email to Bob Wiggins	0.10
5/14/2008	CAM	Telephone call with Christine regarding status of Motion to Compel Tyson's Attorney Billing Records, etc, no scheduling order entered, etc.; drafting email to Rick regarding time information	0.40
5/19/2008	CAM	Receipt of email from Judge Hopkin's clerk regarding conference with Judge	0.50

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**017788-0004      Fox, M. H.**  
**Attorney Fees**

Date	Atty	Description	Hours
<b><i>McGowan, Candis</i></b>			
		on Briefing Schedule; receipt of Mueller's reply email to Judge Hopkin's clerk; receipt of email from Judge Hopkin's clerk regarding parties need to submit a briefing scheduling; receipt of email from Christine regarding information attached for fee petition; drafting reply email to Christine regarding getting with Mueller and Bob about briefing schedule	
5/21/2008	CAM	Receipt of email from Christine regarding Mueller's proposed briefing schedule; telephone conference with Bob Wiggins regarding briefing schedule; receipt of Order on Motion to Compel Briefing scheduling; receipt of email from Christine with Fee Petition documents; receipt of e-filed Joint Motion for Proposed Briefing Schedule	1.00
5/22/2008	CAM	Receipt of Order setting briefing schedule on Motion to Compel	0.10
5/27/2008	CAM	Receipt of email from Dian regarding the deadlines for Motion for Fees; receipt of letter from Christine with Fee Petition Document	0.30
5/28/2008	CAM	Drafting email to Cecil, Buster and Rick regarding information needed for Fee Petition	0.20
5/29/2008	CAM	Drafting email to Rick Buster, and Cecil regarding documents needed from them for Fee Petition	0.20
6/3/2008	CAM	Conference with Bob Wiggins regarding Brief for Fees and affidavits; conference with Bob Childs regarding declarations for Fee Petition; receipt of Bob Child's email to Bruce Rogers with information on Fee Petition for affidavit; telephone call from Bob Childs regarding questions on history of case for briefing for Fee Petition, etc.; receipt of email from Bob Childs with affidavit draft; receipt of emails from Bob Childs to other counsel for affidavits	1.00
6/4/2008	CAM	Working on Brief and documents for Fee Petition; voice mail to Bruce Rogers; telephone call with Bruce Rogers regarding his affidavit, information about case, etc	0.80
6/5/2008	CAM	Receipt and review of Defendant's Opposition of Plaintiff's Motion to Compel Production of Defendant's Fee Payments and Itemization of time	0.30
6/10/2008	CAM	Working on Declarations and Brief for Fee Petition; telephone call with Christine regarding she will handle the Reply to Tyson's Opposition to Motion to Compel	5.60
6/13/2008	CAM	Working on Brief for Fee Petition; conference with Bob Wiggins regarding Brief; conference with Rusty regarding his assignments on Brief; telephone	6.10

**Wiggins, Childs, Quinn & Pantazis, P.C.**  
**Fee Application**

**017788-0004      Fox, M. H.**  
**Attorney Fees**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
call with Christine regarding her Fee Petition, changes she needs to make to same, etc.; conference with Bob Childs regarding Whatley declaration; telephone call from Roger regarding Fee Petition Declaration			
6/14/2008	CAM	Working on Evidentiary Submission for Fee Petition; drafting Brief; drafting Affidavits, etc.	5.80
6/15/2008	CAM	Drafting my declaration; editing time records for last 2 months; drafting and editing brief to support Fee Petition, etc	9.50
			<b>Total</b> 188.50

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**017788-0004      Fox, M. H.**  
**Attorney Fees**

Date	Atty	Description	Hours
<i>Childs, Robert F. Jr.</i>			
1/31/2007	RFC	Conference with Candis McGowain re: various issues for Fox case (.25) review of e-mail for Candis McGowain Re: same (.25); conference call with Robert L. Wiggins, Candis McGowain and Joe Sellers re: same (.75); conference with Robert L. Wiggins and Candis McGowain Re: same (.25)	1.50
2/6/2007	RFC	Conference with C.M. Re: conference call with Sellers tomorrow (.25); review of co-counsel agreement (.25)	0.50
2/7/2007	RFC	Review of information received from Sellers re: location of cases (.25); conference call with Joe Sellers and co-counsel (1.0)	1.25
2/9/2007	RFC	Conference call with co-counsel re: Tyson cases (2.0); telephone conference with R. Doolittle, Robert L. Wiggins, Rusty Johnson and C.M. Re: issues and co-counsel agreement (.25); conference with Rusty Johnson, C.M. and Robert L. Wiggins re: same (.50)	2.75
2/15/2007	RFC	Review and revision of form complaint (.50); conference with Candis McGowan re: same and needed computer data (.25); conference with Joe H. Calvin and Candis McGowan and data and time clock information (.25); conference with Candis McGowan re: data produced by Tyson (.25)	1.25
2/16/2007	RFC	Review and revision of form complaint (1.50); conference with Candis McGowan re: same (.25); further review and revision of form complaint (.75); conference with Candis McGowan re: her conversation with Joe Sellers (.25)	2.75
<b>Total</b>			<b>10.00</b>

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**017788-0004      Fox, M. H.**  
**Attorney Fees**

Date	Atty	Description	Hours
<i>Wiggins, Ann K.</i>			
10/3/2007	AKW	Research model jury instructions and FLSA instructions for Robert L. Wiggins. Search other districts and circuits model jury instructions. Discuss with Robert L. Wiggins.	2.00
10/4/2007	AKW	Research on various issues for pretrial motions including duty to designate under FRCP 30(b)(6), number of persons who can be designated, read practice treatises and cases. Meet and Discuss with Robert L. Wiggins.	3.00
10/19/2007	AKW	Research and draft response to court order regarding whether defendant may offer deposition of non party witness properly served with subpoena. Discuss with Candace and Robert L. Wiggins.	10.00
10/20/2007	AKW	Can't mention in opening facts or theories not ruled on by court. Research judicial estoppel for defendant's use of plaintiffs' expert report and study.	2.50
<b>Total</b>			<b>17.50</b>

**Wiggins, Childs, Quinn & Pantazis, P.C.**  
**Fee Application**

**017788-0004      Fox, M. H.**  
**Attorney Fees**

Date	Atty	Description	Hours
<i>Kiser, Jake A.</i>			
1/24/2008	JAK	Drove to Boaz, AL (7am to 1143 am) and picked up M.H. Fox, took him to the Doctor's office in Albertville, AL; spoke to the doctor and received a medical release form to file for continuance and also obtained medical record release authorization forms from M.H. Fox	4.43
2/7/2008	JAK	Updated client list spoke to M.H. Fox setting up time to meet with him on Monday the 11th to go to doctor.	0.25
2/11/2008	JAK	Met with M.H. Fox in Albertville. Had him sign medical release forms and then took him for his examination with Dr. Raymond N. Fernandez to get a prognosis and to speak with Dr. Fernandez about getting a medical prognosis letter to continue trial. Drafted Motion to Continue for Fox v. Tyson case which is scheduled for Trial on March 3, 2008.	6.00
<b>Total</b>			<b>10.68</b>

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**017788-0004      Fox, M. H.**  
**Attorney Fees**

Date	Atty	Description	Hours
<i>Hooks, Kimberly D.</i>			
10/18/2007	KDH	Compiled and loaded documents into Sanction for trial and trained Katrina Washington on how to use the software.	2.00
10/19/2007	KDH	Loaded additional documents into Sanction and compiled them for trial presentations.	2.00
10/20/2007	KDH	Met with Mr. Wiggins and Candis to go over trial presentation also was available for technical support in the event users working on trial prep had computer problems.	8.00
10/21/2007	KDH	Worked on trial presentation and was available for technical support in the event anyone working to prep for trial had computer problems.	6.00
10/22/2007	KDH	Ran trial presentation software in trial. Assisted with making phone calls, copies, and locating documents for Attorneys.	16.25
10/23/2007	KDH	Ran trial presentation software in trial. Assisted in making phone calls, copies, and locating documents for Attorneys.	12.48
10/24/2007	KDH	Ran trial presentation software in trial. Assisted in making phone calls, copies, and locating documents for Attorneys.	10.95
<b>Total</b>			<b>57.68</b>

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**017788-0004      Fox, M. H.**  
**Attorney Fees**

Date	Atty	Description	Hours
<i>Washington, Katrina</i>			
1/31/2007	KW	Conference with Candis regarding filing change of address notice; draft Notice of Change of Firm Association and Address; edit notice and e-file the same	0.30
4/30/2007	KW	Legal research on subpoenaed individual not showing up for deposition	1.50
5/23/2007	KW	Telephone conference with Dian regarding Mr. Wiggins wants our Summary Judgment brief; locate summary judgment brief, make copies and deliver to Mr. Wiggins; email to Christine regarding briefs; receipt of reply email from Christine regarding briefs	0.30
9/21/2007	KW	Conference with Candis regarding Witness and Exhibit List and Damage Statement; locate documents to for the Exhibit List; conference with Candis regarding Witness and Exhibit List are ready to be e-filed; e-file Witness and Exhibit List; Conference with Candis regarding Damage Statement is ready to be e-filed; e-file Damage Statement	1.50
9/28/2007	KW	Editing Plaintiff's Objections to Defendant's Deposition Designations and His Counter Deposition Designation; conference with Candis regarding pleading is ready to be e-filed; e-file Plaintiff's Objections to Defendant's Deposition Designations and His Counter Deposition Designation; editing Plaintiff's Objections to Defendant's Exhibit List; conference with Candis regarding pleading is ready to be e-filed; e-file Plaintiff's Objections to Defendant's Exhibit List	4.00
10/9/2007	KW	Conference with Candis regarding filing our Statement of Unresolved Objections; locate documents to be included in our unresolved objections; prepare notebook of our unresolved objections; conference with Candis regarding our Statement of Unresolved Objections are ready to be e-filed; e-file Statement of Unresolved Objections	1.50
10/22/2007	KW	Fox trial preparation and attending trial; receipt of Order from Judge, email from defense counsel; make copies of notebooks	7.85
10/23/2007	KW	Fox trial - trial preparation and attending trial; make copies for Candis and Mr. Wiggins; receipt of order from Judge; receipt of pleading from defendant	12.50
10/24/2007	KW	Fox trial - trial preparation, make copies, call Ikon regarding deposition of experts call Christine regarding transcript	9.02
1/9/2008	KW	Conference with Candis regarding filing Plaintiff's Unopposed Motion to	0.30

**Wiggins, Childs, Quinn & Pantazis, P.C.**  
**Fee Application**

**017788-0004      Fox, M. H.**  
**Attorney Fees**

Date	Atty	Description	Hours
<i>Washington, Katrina</i>			
		Continue Trial Date; receipt of email from Candis regarding Motion to Continue; telephone call to Candis regarding locating Motion to Continue to efile; conference with Candis regarding error on Motion to Continue; edit Motion to Continue; print, scan, save and e-file Motion to Continue	
1/25/2008	KW	Conference with Ikon regarding hand delivering a courtesy copy of Motion to Continue Trial Date to Judge Hopkins by 8:30 a.m.	0.20
3/31/2008	KW	Conference with Candis regarding filing Offer of Judgment; receipt of Offer of Judgment and Acceptance of Offer of Judgment; print, scan and e-file Offer of Judgment and Acceptance of Judgment	0.40
		<b>Total</b>	<b>39.37</b>

**Wiggins, Childs, Quinn & Pantazis, P.C.**  
**Fee Application**

**017788-0004      Fox, M. H.**  
**Attorney Fees**

Date	Atty	Description	Hours
<hr/>			
<i>Wiggins, Traci</i>			
<hr/>			
10/24/2007	TW	Phone calls (3) from Robert L. Wiggins; emails and copies of pages of transcript from October 23rd to Christine and Joe Sellers	0.75
			<b>Total</b>
			0.75
			<b>Total</b>
			785.68

**Wiggins, Childs, Quinn & Pantazis, LLC (B'ham)**

The Kress Building  
 301 19th Street North  
 Birmingham, AL 35203

June 16, 2008

M. H. Fox

% Robert L. Wiggins  
 301 19th Street North  
 Birmingham, AL 35203

Matter ID: 017788-0004

**RE: Attorney Fees  
 EXPENSES**

	Photocopy	6,173.60
4/30/2007	Research Expense: West Law: 04/01/07 - 04/30/07	17.74
4/30/2007	Research Expense: West Law: 04/01/07 - 04/30/07	18.04
5/4/2007	Witness Fee	78.38
	Brad Bingham (Check No. 12148)	
5/4/2007	Witness fee	96.09
	Pamela Blackmon (Check No. 12143)	
5/4/2007	Witness Fee	112.55
	Shelia Roden (Check No. 12145)	
5/4/2007	Witness Fee	116.55
	Keith Rhodarmer (Check No. 12144)	
5/7/2007	Fax	2.00
5/7/2007	Process Service	400.00
	Steve Herlihy, Process Server (Check No. 12537)	
5/8/2007	Postage	4.77

**Wiggins, Childs, Quinn & Pantazis, LLC (B'ham)**

5/8/2007	Postage	4.05
5/11/2007	Katrina Washington, 4/23/2007 to 5/6/2007 OT	197.67
5/16/2007	Transcript Expense	78.50
	Birmingham Reporting Service (Check No. 13991)	
9/30/2007	Research Expense: Pacer: 07/01/07 - 09/30/07	6.24
9/30/2007	Research Expense: West Law: 09/01/07 - 09/30/07	18.21
10/3/2007	Witness Fee	96.23
	Nicole Bingham Harper (Check No. 13289)	
10/3/2007	Tabs	25.40
10/9/2007	E-Copies	0.40
10/12/2007	Katrina Washington 9/24/07 to 10/7/07 OT	459.55
10/12/2007	Color Copies	22.50
10/15/2007	Witness Fee	93.37
	Narciso Maldonado (Check No. 13424)	
10/15/2007	Witness Fee	93.61
	Jerry Phillips (Check No. 13419)	
10/15/2007	Witness Fee	93.37
	Narciso Maldonado (Check No. 13421)	
10/15/2007	Witness Fee	84.54
	Beamon Mason (Check No. 13413)	

**Wiggins, Childs, Quinn & Pantazis, LLC (B'ham)**

10/15/2007	Witness Fee	92.19
	Susan Dennis (Check No. 13415)	
10/15/2007	Witness Fee	96.35
	April Masters (Check No. 13416)	
10/15/2007	Witness Fee	93.37
	Narciso Maldonado (Check No. 13418)	
10/15/2007	Witness Fee	93.16
	Jerry Phillips (Check No. 13420)	
10/15/2007	Witness Fee	93.61
	Jerry Phillips (Check No. 13422)	
10/17/2007	Photocopy Expense	80.42
	IKON Office Solutions (Check No. 14345)	
10/17/2007	5" Binder"	15.00
10/17/2007	1" Binder"	2.00
10/18/2007	Color Copies	38.25
10/19/2007	Courier	62.40
	Tommy Gilreath (Check No. 13452)	
10/19/2007	Fax	2.00
10/19/2007	Color Copies	3.75
10/19/2007	Courier	62.40
	Tommy Gilreath (Check No. 13452)	
10/19/2007	Tabs	33.60

**Wiggins, Childs, Quinn & Pantazis, LLC (B'ham)**

10/19/2007	4" Binder"	48.00
10/19/2007	Tabs	40.40
10/19/2007	2" Binder"	14.00
10/21/2007	Color Copies	22.50
10/22/2007	Fax	23.00
10/22/2007	Photocopy Expense	132.40
	Robert L. Wiggins Jr. (Check No. 14760)	
10/23/2007	Travel Expense	38.00
	Ann K. Wiggins (Check No. 14603)	
10/23/2007	Fax	3.00
10/23/2007	Federal Express	55.97
	Federal Express (Check No. 13702)	
10/23/2007	Mileage Expense	96.00
	Ann K. Wiggins (Check No. 14603)	
10/23/2007	Tabs	33.60
10/23/2007	4" Binder"	48.00
10/23/2007	Tabs	28.00
10/23/2007	4" Binder"	48.00

**Wiggins, Childs, Quinn & Pantazis, LLC (B'ham)**

10/23/2007	4" Binder"	48.00
10/23/2007	Tabs	33.60
10/23/2007	Tabs	28.00
10/23/2007	4" Binder"	48.00
10/24/2007	2" Binder"	7.00
10/24/2007	2" Binder"	7.00
10/25/2007	Courier	54.40
	Tommy Gilreath (Check No. 13558)	
10/25/2007	Mileage Expense	144.00
	Robert L. Wiggins Jr. (Check No. 14760)	
10/25/2007	Courier	54.40
	Tommy Gilreath (Check No. 13558)	
10/25/2007	Courier	54.40
	Tommy Gilreath (Check No. 13558)	
10/25/2007	Process Service	706.80
	Wood's Courier Service (Check No. 14195)	
10/25/2007	Color Copies	41.25
10/25/2007	5" Binder"	60.00
10/25/2007	Tabs	126.40

**Wiggins, Childs, Quinn & Pantazis, LLC (B'ham)**

10/25/2007	2" Binder"	56.00
10/25/2007	5" Binder"	60.00
10/25/2007	Tabs	126.40
10/25/2007	2" Binder"	56.00
10/26/2007	Transcript Expense	680.50
	Chanetta Sinkfield (Check No. 13513)	
1/16/2008	Fax	9.00
1/16/2008	Scans	0.80
1/24/2008	Mileage Expense	77.77
	Jacob A. Kiser (Check No. 14290)	
1/25/2008	Postage	31.16
2/11/2008	Mileage Expense	77.27
	Jacob A. Kiser (Check No. 14598)	
3/31/2008	Research Expense: Pacer: 01/01/08 - 03/31/08	16.80
3/31/2008	Fax	3.00
3/31/2008	Fax	3.00
3/31/2008	Research Expense	16.80

**Wiggins, Childs, Quinn & Pantazis, LLC (B'ham)**

3/31/2008	Research Expense: West Law: 03/01/08 - 03/31/08	567.33
3/31/2008	Research Expense: West Law: 03/01/08 - 03/31/08	393.32
3/31/2008	Research Expense: West Law: 03/01/08 - 03/31/08	1,046.50
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<b>TOTAL EXPENSES</b>		<b>\$ 14,327.63</b>

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Childs, Robert F. Jr.</i>			
2/14/2007	RFC	Review and revision of form complaint (.50; meeting with Candis McGowan and Robert L. Wiggins re: changes to form complaint, various issues and work to be done (.75); conference with Candis McGowan re: her conversation with Hatchett and issues (.25)	1.50
4/16/2007	RFC	Review of various pleadings (1.0); conference with Candis McGowan re: update on issues (.50)	1.50
4/23/2007	RFC	Review of 30 (b) (6) Notice (.25); review of discovery (.25); conference with Candis McGowan re: same (.50)	1.00
4/24/2007	RFC	Review of deposition of Willie Marsh (1.0); further review of deposition (1.0)	2.00
4/25/2007	RFC	Review of e-mails re: discovery (.25); review of Charlie Baker deposition (1.50); review of Hatchett deposition (1.0)	2.75
4/30/2007	RFC	Review of Motion to Stay response by Webber	0.50
5/3/2007	RFC	Conference with Candis McGowan re: update	0.25
5/8/2007	RFC	Conference with Candis McGowan and Rusty Johnson re: depositions and notice from Tyson that they will not appear or provide witnesses (.50); review of Tyson Motions and conference with Candis McGowan re: same (.75)	1.25
5/11/2007	RFC	Review of pleadings re: response to Motion for Protective Order (.75); conference with Candis McGowan re: same	1.00
6/3/2008	RFC	Telephone conference with Candis McGowan re: help in fee petition (.25); telephone conference with Bruce Rogers re: giving affidavit and facts (.25); review and revision of Rogers affidavit (.75); telephone conference with Joe Whatley re: giving his affidavit (.25); telephone conference with Bradley re: same (.25); telephone conference with J. Alexander re: same (.25); review and revision of Rogers affidavit (.50);	2.50
6/4/2008	RFC	Review and revision of Rogers affidavit (.25); preparation of Whatley affidavit (.50); preparation of Baxley affidavit (.50); review and revision of Rogers affidavit (.25); review and revision of Whatley affidavit (.50); review and revision of Baxley affidavit (.50); final review of all affidavits (.50); and e-mail to Candis McGowan with affidavits and contact information (.25).	3.25

**Wiggins, Childs, Quinn & Pantazis, P.C.  
Fee Application**

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
	<i>Childs, Robert F. Jr.</i>		
			<b>Total</b>
			<b>17.50</b>

**Wiggins, Childs, Quinn & Pantazis, P.C.**  
**Fee Application**

**018435-0001      Brothers, Teresa**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Hooks, Kimberly D.</i>			
10/28/2007	KDH	Compiled and organized documents to be added to trial presentation. Available for technical assistance for users working on trial prep.	6.77
10/29/2007	KDH	Ran trial presentation software in trial. Assisted in making phone calls, copies, and locating documents for Attorneys.	14.03
10/30/2007	KDH	Ran trial presentation software in trial. Assisted in making phone calls, copies, and locating documents for Attorneys.	13.63
10/31/2007	KDH	Ran trial presentation software in trial. Assisted in making phone calls, copies, and locating documents for Attorneys.	13.75
11/1/2007	KDH	Ran trial presentation software in trial. Assisted in making phone calls, copies, and locating documents for Attorneys.	10.52
		<b>Total</b>	<b>58.70</b>

**Wiggins, Childs, Quinn & Pantazis, P.C.**  
**Fee Application**

**018435-0001      Brothers, Teresa**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Johnson, Rusty N.</i>			
5/8/2007	RNJ	Conferences with Robert L. Wiggins, Robert F. Childs, and Candis M re: depositions of fact witnesses & corp. Representative. Re: three plaintiffs, and with Candis McGowan and Christine W re: filing required material with 11th Cir.	2.00
5/9/2007	RNJ	Conferences with Robert L. Wiggins and Candis M re: defendant's protective order, and assisting Candis M at depo to note objection to same on record.	1.00
		<b>Total</b>	<b>3.00</b>

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
2/9/2007	CAM	Meeting on trial prep and responsibilities	0.80
2/12/2007	CAM	Receipt of email from Christine with settlement offers for each of the named plaintiffs and other information on settlement; attempting to reach Fox; attempting to reach Brothers; attempting to reach Hatchett; receipt of email from Christine regarding Mitchell rejected settlement; telephone call from Roger regarding settlement offers; conference call with Bob Wiggins, Bob Childs and Roger regarding settlement offers and legal issues; conference with Wiggins and Childs regarding issues raised by Roger; conference call with Joe Sellers, Wiggins and Childs regarding status of case, legal issues, etc	4.50
2/14/2007	CAM	Conference with Childs regarding legal issues in Alabama; research for Childs on Alabama legal issues; conference with Childs regarding results of research; conference with Wiggins and Childs regarding legal issues in Alabama, etc; telephone call with Angela Hatchett regarding status of case, trial date, and conveyed settlement offer, she said to reject the offer; voice mail message on numbr for M. H . Fox	2.80
2/15/2007	CAM	Conference call with Bob regarding electronic data needed in case; voice mail to Joe regarding question on payroll record data in Alabama; voice mail to Teresa Brothers last known contact numbers; telephone call from Teresa Brothers regarding conveyed settlement offer and status of the case, she will call back on Monday with response to settlement offer; drafting email to co-counsel regarding call with Teresa Brothers; drafting email to Christine regarding updated contract information for Brothers and Hatchett; telephone call from Christine regarding information on time records data from Albertville, status of tracking down M.H. Fox, my calls with Hatchett and Brothers, etc.; telephone call from Lisa Pederson regarding contacting Union representative.'s, issues with Alabama plants, issues with case due to Court's Order, etc	2.30
2/19/2007	CAM	Voice mail from Teresa Brothers regarding reject the settlement offer; telephone call to Teresa Brothers regarding confirming that she wants to reject settlement offer, trial date, sending her a copy of her deposition transcript; drafting email to co-counsel regarding Teresa Brothers wants to reject settlement offer; receipt of email from Joe Sellers regarding Brothers rejection of offer; telephone call to M. H. Fox regarding discussed status of case, trial date and conveyed offer of settlement, M. H. Fox would like to settle, but not for that amount; drafting email to co-counsel regarding M. H. Fox's response to settlement offer; receipt of email from Christine regarding status of plaintiffs' response to settlement offers; receipt of email from Jay	2.70

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<b><i>McGowan, Candis</i></b>			
		regarding when he expects to talk to his plaintiffs; receipt of email from Roger regarding Princess Brown rejected the offer of settlement	
3/8/2007	CAM	Voice mail to Christine regarding expert report deadlines	0.10
3/9/2007	CAM	Long telephone call from Christine regarding expert report for Fox, discovery in Alabama, scheduling Order in the cases, etc.; what needs to be done in the other cases, etc.; receipt of email from Christine regarding the supplemental discovery from three (3) Alabama plaintiffs; drafting email to Mueller regarding please change address on the Certificate of Service; drafting reply email to Mueller; drafting email to Childs regarding conference call; receipt of reply email from Childs;	1.50
3/15/2007	CAM	Telephone call with Christine regarding information on cases, expert report due in Fox today, etc.; receipt of email from Christine with expert reports for Fox, Hatchett and Brothers and reviewing the same; conference with Bob Wiggins regarding expert reports	1.00
3/20/2007	CAM	Telephone call from Christine regarding request from Mueller to take deposition of expert, possible dates, she will handle, etc.; telephone call from Christine regarding may attend the deposition	0.40
3/21/2007	CAM	Receipt of email from Christine with date and time for Expert witness, Schneider's deposition; drafting reply email to Christine; conference with Bob Childs regarding date of deposition of Schneider	0.30
3/27/2007	CAM	Conference with Bob Wiggins regarding discovery responses from Tyson and what needs to be done, etc.; telephone call from Buster regarding status of cases; voice mail to Christine regarding need discovery produced by Tyson; telephone call with Christine regarding results of deposition of Schneider, we need discovery produced by Tyson on named plaintiffs, etc	0.80
3/30/2007	CAM	Telephone call from Christine regarding sending emails with discovery responses, please forward to Bob Wiggins; telephone call with Bob Wiggins regarding discovery responses; receipt of email from Christine with Motion to Amend Protective Order; reviewing Motion to Amend Protective Order; drafting email to Christine regarding my thoughts on Motion; voice mail to Rusty regarding recent case on Protective Orders	1.30
4/2/2007	CAM	Receipt of email from Rusty with case on confidential orders; drafting email to Christine regarding case on Protective Orders; telephone call with Christine regarding Motion to Amend Protective Order	0.40

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
4/3/2007	CAM	Telephone call with Rick Kuykendall regarding status of cases, what needs to be done, etc	0.30
4/4/2007	CAM	Receipt of Federal Express package from Christine with personnel files of Fox, Brothers and Hatchett and reviewing same; receipt of email from Christine regarding Protective Order Motion	0.30
4/5/2007	CAM	Receipt of Motion to Intervene to Modify the Protective Order; receipt of email from Christine regarding Motion and other litigation issues	0.40
4/10/2007	CAM	Receipt of Order setting schedule for Tyson to respond to Motion to Intervene and Motion to Amend Protective Order	0.20
4/17/2007	CAM	Receipt of Motion for Extension of Time for Tyson to Respond to Motion to Amend Protective Order	0.20
4/24/2007	CAM	Editing 30(b)(6) deposition notices, voice mail to Bob Wiggins regarding deposition notice; executing 30 (b)(6) Notice for serving the same; receipt of fax letter from Mueller regarding defendant opposes any further discovery;	0.70
4/25/2007	CAM	Telephone call with Christine regarding need information and copy of 30(b)(6) Notice, Mueller's letter and position on discovery, etc.; drafting email to Christine with Mueller's letter; receipt of emails from Christine with Mueller's letter; receipt of emails from Christine with discovery responses; receipt of emails from Bob Wiggins regarding information needed for case; drafting reply emails to Bob Wiggins with requested information; conference with Bob Wiggins regarding status of discovery; executing deposition notices to Tyson; receipt of Tyson's responses to Modification of the Protective Order; voice mail to Christine	1.40
4/26/2007	CAM	Conference call with Bob Childs regarding depositions of supervisors	0.20
5/3/2007	CAM	Receipt of message from Bob regarding status of depositions next week; conference with Katrina regarding status of subpoenaing the supervisors, etc	0.20
5/4/2007	CAM	Executing subpoenas for supervisors' depositions; telephone call with process server regarding service of subpoenas	0.20
5/7/2007	CAM	Voice mail from process server regarding status of serving subpoenas; receipt of memo from process server regarding service of subpoenas and requests from one of the witnesses, Shelia Roden; telephone call to Shelia regarding accommodations she needs for the deposition; conference with Bob Wiggins regarding accommodations Shelia Roden needs, moving deposition due to	2.00

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		hearing; sending letter to Mueller regarding moving deposition; telephone call to Shelia Roden regarding moving her deposition to Friday, will send her a letter to confirm, etc.; conference with Bob Childs regarding status of deposition's and Notice from 11th Circuit on jurisdiction issue; drafting letter to Mueller regarding moving deposition of Shelia Roden	
5/8/2007	CAM	Preparing for depositions of supervisors; voice mail to Mueller regarding depositions; voice mail to David Smith regarding depositions; telephone call to Bob Wiggins regarding depositions and appeal forms, etc.; telephone call from Shelia Roden regarding problems with attending her deposition; conference with Rusty regarding depositions tomorrow; voice mail from Evangeline Pascal regarding Tyson will not be at the deposition; conference call with Bob Childs regarding Tyson's position on depositions; telephone call to Bob Wiggins regarding Tyson's position on deposition's in voice mail; conference with Rusty regarding depositions; receipt of email from Evangeline regarding not coming to depositions; telephone call from David Smith regarding not involved with depositions	7.10
5/9/2007	CAM	Receipt of Tyson's Motion and Supporting Brief for a Protective Order on the Depositions; conference with Bob Wiggins and Rusty regarding Tyson's position and our responses; attending the 30(b)(6) deposition to state our position on the record; reviewing Tyson's Brief; telephone call to Christine regarding Tyson's position and need copy of the January 2007 transcript; receipt of email from Christine with copy of the transcript and reviewing the same; receipt of email from Christine regarding PJC's help on the Briefs and conference call; telephone call from deposition witness, Brad Bigham, regarding Tyson attorneys told him to not to show up for deposition; conference with Bob Wiggins regarding depositions, reply to motion, PJC's offer, etc.; telephone call to Bingham regarding moving his deposition to Friday, drafting email to Christine regarding conference call times	6.70
5/10/2007	CAM	Editing and drafting response to Protective Order; conference call with Bob Wiggins, Christine and Debra Gardner regarding same; conference with Bob regarding response to Motion for Protective Order, our Motion to Compel, etc., and deposition of individuals; telephone call to Mr. Bingham regarding wait for ruling from the Court; drafting email to Christine regarding draft of reply for her review; receipt of email from Christine with her changes to draft; receipt of Orders to file under seal	6.10
5/11/2007	CAM	Editing Motion to Compel and Response to Motion for Protective Order; conference with Bob Childs regarding his changes to the Motion to Compel; making final revision to motion for e-filing the same; receipt of e-filed response and motion	2.00

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
5/14/2007	CAM	Receipt of filed under seal notices for Tyson's Motion for Protective Order in Fox, Hatchett and Brothers cases,	0.30
5/21/2007	CAM	Reviewing Defendant's Reply in Support of Motion for Protective Order; telephone call with Christine regarding Tyson's reply; conference with Bob Wiggins regarding Reply filed by Tyson	0.60
5/24/2007	CAM	Receipt of Tyson's responses and objections to document requests	0.30
5/29/2007	CAM	Receipt of Orders granting Motion to Quash Subpoenas and Deposition Notices; conference with Bob Childs regarding Orders	0.40
5/30/2007	CAM	Conference with Bob Wiggins regarding Judge's Order denying depositions, etc	0.20
8/1/2007	CAM	Receipt of Tyson's Motion to Reconsider Denial of Summary Judgment; drafting email to Bob Wiggins regarding Motion filed by Tyson; receipt of copy of Tyson's email to Judge Hopkins with courtesy copy of Motion	0.40
8/1/2007	CAM	Drafting email to Joe Sellers regarding Tyson's Motion	0.20
8/2/2007	CAM	Receipt of email from Joe regarding Tyson's Motion to Reconsider Denial of Summary Judgment; receipt of Order setting Briefing Schedule; receipt of email from Christine regarding conference call to discuss Reply Brief; drafting reply email to Christine regarding time for call; drafting email to Bob Wiggins regarding Order on briefing schedule; telephone call from Roger Doolittle regarding Order on Briefing Scheduling	0.90
8/3/2007	CAM	Receipt of email from Christine regarding response to Tyson's Motion to Reconsider Denial of Summary Judgment; reviewing Tyson's Motion to Reconsider; telephone call with Christine regarding responding to Motion, status of Cagles Petition for Rehearing, etc	0.90
8/5/2007	CAM	Reviewing Tyson's Motion to Reconsider and the Cagle's opinion for use in responding to the same	1.30
8/6/2007	CAM	Conference with Bob Wiggins regarding Motion filed by Tyson, responding to same, Motion to Stay, etc; voice mail to Christine regarding Motion for Stay and responding to Motion; receipt of email from Christine with draft of outline for Reply Brief; telephone call with Christine regarding Reply Brief, legal arguments, filing Motion for Extension, etc.; voice mail to Bob Wiggins regarding conversation with Christine; receipt of email from Christine with draft of Reply Brief	1.10

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
8/7/2007	CAM	Conference with Bob Wiggins regarding conversation with Christine and outline for reply Christine prepared, Motion to Stay, etc.; drafting email to Christine regarding Bob Wiggins thoughts on the Motion to Stay; voice mail from Christine regarding Mueller agreed to extension; receipt of e-filed Motions for Extension to respond to Tyson's Motion to Reconsider Denial of Summary Judgment; conference with Bob Wiggins regarding motion filed by Christine; telephone call with Christine regarding responding to motion; motion to stay, assignment of work, her call with Mueller, etc.; reviewing Christine's outline for the Reply Brief	1.10
8/8/2007	CAM	Receipt of Order granting Extension to File Reply to Tyson's Motion to Reconsider; receipt of Bob Wiggins' Notice of Appearance; drafting email to Bob Wiggins with Order on Extension; receipt of email from Christine with draft of outline for Reply	0.60
8/9/2007	CAM	Telephone call with Christine regarding Reply Brief, Motion for Extension, etc.; receipt of e-mail from Christine to Robert Camp regarding legal arguments for the case; telephone conference with Bob Wiggins regarding emails	0.50
8/13/2007	CAM	Receipt of email from Christine regarding legal arguments and some potential issues; receipt of Bob Wiggins' reply email to Christine regarding the legal arguments	0.40
8/14/2007	CAM	Telephone call with Christine regarding status of Reply Brief, I will draft the Motion for Stay, etc.; telephone call to Bob Wiggins regarding questions on Reply Brief status, Motion to Stay, etc.; telephone call to Christine regarding Bob Wiggins' questions on legal arguments; receipt of email from Christine regarding information to use in Motion to Stay	0.60
8/15/2007	CAM	Working on Motion to Stay; receipt of email from Christine regarding questions on legal arguments Reply Brief; telephone call from Roger regarding Reply Brief status; receipt of email from Bob Wiggins to Christine regarding information for Reply Brief; receipt of Rusty's email to Christine with information for Reply Brief; receipt of Bob Wiggins email to Christine; conference with Bob Wiggins; receipt of Christine's reply email to Bob Wiggins	1.70
8/16/2007	CAM	Receipt of email from Christine regarding information for 3(o) issue; drafting and editing Motion to Stay; voice mail from Christine regarding she will contact Mueller about Stay; telephone call with Christine regarding Mueller's position on Motion to Stay, revising brief, etc.; receipt of email from Christine regarding revised Reply Brief for Opposition to Tyson's Motion to Reconsider Summary Judgment Denial; drafting email to Christine with draft to Motion to	7.30

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		Stay for her review; receipt of email from Christine with her changes to Motion to Stay; editing Reply Brief; drafting email to Christine with my changes to Motion to Stay; telephone call to Christine regarding my changes to the Reply Brief, possible exhibits to file under seal with Reply Brief, she will e-file Motion to Stay and Reply Brief, etc	
8/20/2007	CAM	Reviewing Tyson's response to the Motion to Stay; voice mail from Christine regarding replying to Tyson's response; receipt of email from Christine regarding call from Mueller on Pre-trial Order; receipt of Order setting hearing on Motion to Stay and Motion to Reconsider the Denial of Summary Judgment; telephone call with Christine regarding hearing on motions scheduled for next week, division of work assignments, response to Tyson's Opposition to Motion to Stay; Pre-trial Conference and date Joint Order is due contacting Tyson about Joint Motion to Continue Pre-trial conference due to pending motions, etc.; working on proposed Joint Pre-trial Order; telephone call from Roger Doolittle regarding order setting hearing on motions status of reply to opposition to stay, etc.; receipt of email from Christine regarding Tyson won't agree to move for continuance; drafting reply email to Christine regarding documents needed from her to prepare Pre-trial Orders	2.20
8/21/2007	CAM	Receipt of email from Christine with draft of Reply to Motion to Stay and editing the same; drafting email to Christine regarding Reply fine to file; receipt of e-filed Reply to Opposition to Stay	0.60
8/22/2007	CAM	Working on Pre-trial Order; drafting Brothers Pre-trial Order	1.50
8/23/2007	CAM	Receipt of email from Christine regarding copy of Mueller's email on Pre-trial Order and Joint Statement of Facts; drafting reply email to Christine regarding response to Mueller; receipt of Christine's email to Mueller regarding Joint Statement of Facts for Pre-trial Order; receipt of Order striking Reply Brief for Motion to Stay; drafting email to Christine regarding order; receipt of email from Christine regarding questions on Order; drafting reply email to Christine regarding answers to her questions; working on Pre-trial Order; receipt of e-file corrected Reply Brief; receipt of Motion to file corrected Brief in Opposition to Summary Judgment denial	4.60
8/24/2007	CAM	Receipt of Order - mooted the striking of the briefs; working on the Pre-trial Orders; receipt of email from Christine regarding conference call; receipt of email from Bob Wiggins regarding conference call; receipt of email from Bob Wiggins regarding conference call; receipt of Tyson's response to our Opposition to Motion to Reconsider Summary Judgment; receipt of Tyson's email to Judge with copy of pleadings; voice mail from E. Pasqual regarding motion to file under seal; receipt of motion to file under seal	4.30

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
8/26/2007	CAM	Drafting proposed Pre-trial Order for Teresa Brothers	2.80
8/27/2007	CAM	Editing Brothers Pre-trial Order; voice mail to Christine regarding Pre-trial Order; drafting email to Christine with copy of proposed Pre-trial Order for her review; receipt of email from Christine regarding her suggested changes on the Pre-trial Order; call with Christine regarding her changes to the Pre-trial Order, reasons for same, my additional changes, etc.; making final changes to Brothers Pre-trial Order; drafting Hatchett Pre-trial Order; drafting email to Christine and Bob Wiggins with copy of revised Pre-trial Order; receipt of email from Christine regarding legal arguments for Summary Judgment hearing; receipt of reply email from Bob Wiggins regarding his thoughts on Summary Judgment hearing; drafting Fox Pre-trial Order	5.30
8/28/2007	CAM	Drafting the Plaintiff's position for the Pre-trial Order in Hatchett; drafting e-mail to Christine with Order and reasons for the positions for her review; editing Fox' Pre-trial Order; drafting email to Christine with copy of Hatchett Pre-trial Order; receipt of email from Christine with her thoughts on Fox Pre-trial Order; receipt of email from Christine with her thoughts on Hatchett Pre-trial Order; telephone call with Christine regarding changes to the Pre-trial Orders, reasons for same, etc.; making final corrections to all three (3) Pre-trial Orders; receipt of email from Mueller with his proposed Pre-trial Order; drafting email to Mueller with our proposed Pre-trial Order; receipt of email from Mueller regarding his Pre-trial Order, receipt of reply email from Christine to Mueller; receipt of Order granting Motion to File Under Seal	5.90
8/29/2007	CAM	Voice mail from Mueller regarding time to talk; reviewing defendant's proposed Pre-trial Order; telephone call to Christine regarding issues with Mueller's proposed Narrative Statement, issues with Mueller's agreed facts, etc.; conference call with Christine to Mueller regarding proposed Pre-trial Order, what we can agree to, what we oppose, his position, etc.; receipt of email from Mueller with WordPerfect version of Orders to add Defendant's changes and positions; telephone call from David Smith regarding hearing tomorrow and problems I am having with computer in merging defendant's positions into Pretrial Order due to codes in their documents, etc.; telephone call from David Smith regarding agreement to email WordPerfect versions of the Pre-trial Order to the Court today and hand deliver hard copy tomorrow, etc; conference with Bob Wiggins regarding Pre-trial Order and hearing; drafting email to Judge Hopkins with copy of all three (3) Pre-trial Orders; preparing for hearing on motions; telephone call from Christine regarding hearings tomorrow and new issues, etc.; drafting letter to Hopkins regarding Pre-trial Order	6.60
8/30/2007	CAM	Meeting with Christine regarding new legal arguments; preparing for and attending hearing on Tyson's Motion to Reconsider Summary Judgment and our Motion to Stay with Christine Webber; conference with Christine regarding	7.10

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		results of hearing; receipt of Minute Entry from the clerk	
8/31/2007	CAM	Telephone call from Roger regarding results of hearing; conference with Bob Childs regarding results of hearing yesterday; receipt of Order Denying Motion for Stay; receipt of Order partially granting Tyson's Summary Judgment on 3(o) issue	0.80
9/3/2007	CAM	Telephone call from Roger regarding Orders from Judge Hopkins on Motion to Stay and Motion on Summary Judgment	0.30
9/4/2007	CAM	Telephone call with Joe regarding hearing on Thursday, Court's Orders on Motion to Reconsider and Motion to Stay, Pretrial Conference, etc.; telephone call with Bob Wiggins regarding results of hearing, Orders and Pretrial; voice mail from Mueller's assistant regarding copy of Pretrial Orders; drafting email to Schiavo regarding copy of Pretrial Orders	0.70
9/5/2007	CAM	Receipt of email from Mueller regarding dates for Pretrial Order, receipt of email from Mueller regarding problems with font size in Pretrial Order; drafting reply email to Mueller regarding having his secretary correct same and send to me; drafting email to Mueller that our copies are in correct font	0.50
9/6/2007	CAM	Voice mail from Joe regarding Mueller's telephone calls; voice mail to Joe; regarding receipt of email from Mueller; conference call with Mueller and David Smith regarding dates for exchanging witnesses, voir dire, objections, etc.; preparing for the Pretrial Conference with Judge Hopkins; attending the Pretrial Conference with Judge Hopkins; receipt of email from Christine regarding case law for Judge Hopkins; drafting reply email to Christine; telephone call with Joe Sellers regarding settlement call from Mueller, results of Pretrial Conference, etc.; receipt of docket text notice of the Pretrial Conference.	4.10
9/7/2007	CAM	working on Record for 11th Circuit; editing designation of the record for e-filing	1.00
9/9/2007	CAM	Receipt of email from Mueller with Schedule of due dates for Pretrial Order; reviewing de As case	0.50
9/10/2007	CAM	Receipt of email from Mueller's paralegal regarding letter about documents not produced and copies of new documents; reviewing new documents just produced by Tyson	0.50
9/11/2007	CAM	Conference with Bob Wiggins regarding notifying Judge Hopkins of de Asencio case; drafting email to Judge Hopkins and co-counsel with copy of	0.20

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		de Asencio case	
9/12/2007	CAM	Receipt of email from Joe regarding his settlement meeting with Mueller and need for a conference call; drafting email to Joe regarding time for conference call; receipt of email from Joe regarding confirming call number and time; conference call with Bob Wiggins and Joe regarding settlement talks with Mueller; legal issues with three trials, our possible responses, etc.; conference with Bob Wiggins regarding trial issues and responding to the Tyson's request, etc.	1.20
9/13/2007	CAM	Receipt of the Pretrial Order signed by Judge Hopkins in Fox, Hatchett, and Brothers; email from Joe Sellers regarding settlement and case law; receipt of Christine's reply email	0.40
9/14/2007	CAM	Voice mail to Joe Sellers regarding email from Mueller and settlement; receipt of email from Joe regarding scheduling conference call for Monday; preparing for trial and Damage Statement (attorneys fees), etc.; reviewing depositions to prepare Witness Lists	4.50
9/17/2007	CAM	Reviewing deposition transcript for witness names for use in the trial; drafting email to Joe Sellers regarding settlement proposal; telephone from Christine regarding proposal Joe is suggesting, my concerns with same, etc.; conference call with Bob Wiggins regarding Joe's proposal for settlement offer, our concerns, hours in case, etc.; telephone call with Christine regarding Bob Wiggins and my thoughts on settlement offer; telephone call from Christine regarding Joe's response to our concerns and reasons; conference with Bob Wiggins regarding Joe's thoughts and reasons for same; telephone call to Christine regarding Bob Wiggins' response for Joe, discovery responses needed for witness identification, etc.; telephone call to Lisa Pederson regarding witnesses needed from the UFCW she will have Renee contact me, etc; receipt of copy of Joe's email to Mike Mueller with the settlement offer; receipt of email from Christine with Amended Interrogatory Answers for Hatchett, Fox, Brothers	6.40
9/18/2007	CAM	Working on Witness List; telephone call from Rene Bowser regarding witness needed from the Union to testify on de minimis issue; reviewing deposition testimony for Witnesses and Exhibits; drafting email to Joe Sellers regarding settlement discussions; calendaring dates from Pretrial Order; drafting email to Mueller regarding disputes with his outline of due dates from Pretrial Order; voice mail from witnesses reviewing deposition transcripts	6.80
9/19/2007	CAM	Voice mail to Katrina regarding documents needed from the file for Exhibit List; receipt of email from Mueller regarding response to my email with questions on his deadline outline; voice mail from Renee Bowser regarding	9.40

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		witness name and contact information; voice mail to Renee regarding witness information; conference call with Bob regarding witness preparation, exhibits for trial, deposition to use, trial strategy, etc.; drafting email to Joe regarding trial questions; conference call with Joe and Christine regarding information from Mueller, questions on previous depositions, trial strategy, etc.; reviewing depositions for use in trial; working on Witness List; attempting to locate witnesses; working on Exhibit List; telephone call with Christine regarding additional depositions needed from them, information for damage calculations, etc.; reviewing Expert's Reports for use in calculating damages; conference with Bob Wiggins regarding information from Joe and Christine and Expert Reports	
9/20/2007	CAM	Working on locating witnesses for trial; voice mail to the President of the Nashville local regarding need copy of CBA and address for Union Representative; working on Exhibit List; working on Witness List; working on Damage Statement; receipt of email from Christine and her paralegal; telephone call with Greg Stallings, UFCW Local 1995 President, regarding information needed for the case; reviewing depositions for exhibits; editing Witness and Exhibit Lists; drafting and editing Damage Statement; drafting email to Bob with Damage Statement	10.60
9/21/2007	CAM	Telephone call with Dian regarding email to Bob with Damage Statement; conference with Bob Wiggins regarding Damage Statement; conference with Bob Wiggins regarding Damage Statement and his suggested changes to the same; editing Damage Statement; conference with Lisa Sandlin regarding calculation of prejudgment interest; receipt of email from Mueller regarding disclosures due today and method of exchanging same; editing Witness List and Exhibit List; drafting email to Mueller regarding my understanding of what is due today under the Pretrial Order; drafting email to Christine with copy of the Damage Statement for her review; conference with Lisa Sandlin regarding calculation of prejudgment interest and the amount; telephone call with Christine regarding her changes to the Damage Statement and her additions to the Witness and Exhibit Lists; receipt of email from Christine with copy of new exhibit; receipt of email from Christine with the transcript; preparing the designations of the deposition pages for witnesses; making final corrections to the Witness and Exhibit Lists and Damage Statement for e-filing; conference with Bob Wiggins regarding his approval and suggested changes for the pleadings; receipt of e-filed copies of Damage Statement and Witness and Exhibit Lists	7.30
9/23/2007	CAM	Receipt and review of Tyson's Witness List, Exhibit List and Deposition Designations	0.40
9/24/2007	CAM	Reviewing Tyson's Exhibit Lists in Fox, reviewing Tyson's Witness List in Fox	0.70

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		and reviewing Tyson's deposition designation to prepare objections to the same; receipt of email from Christine regarding call from court reporter about 8/30 hearing transcript; drafting reply email to Christine regarding transcript of hearing	
9/25/2007	CAM	Voice mail to Christine; voice mail from Christine; telephone call with Christine regarding email from Mueller and his objections to our exhibits and witnesses, etc	0.50
9/26/2007	CAM	Receipt of email from Mueller with attached letter outlining his objections to our deposition designations, working on Witness List in Brothers' case; working on Exhibit List in Brothers' case; reviewing depositions for use in Brothers case; voice mail to Christine regarding objections to Tyson's Lists and Objections to our Lists in Fox; telephone call with Christine regarding objections for Fox case, settlement call Joe had with Mueller, etc; conference call with Christine to M. H. Fox regarding trial date, damages now due to recent court ruling, authority for settlement offer, etc; telephone call with Christine regarding interrogatory responses needed my position on witnesses, etc.; receipt of email from Christine regarding interrogatory responses; receipt of Order in Fox on narrative testimony; voice mail from Renee Bowser regarding witnesses for trial	10.10
9/27/2007	CAM	Working on Exhibit List for Brothers; reviewing the information from Brothers deposition for use in calculating damages; editing and drafting Witness List; drafting Damage Statement; voice mail to Christine; reviewing Tyson's Objections in Mueller's letter; drafting and editing Objections to Tyson's Exhibit List; drafting Objections to Tyson's Deposition Designations and drafting our Counter Deposition Designations; telephone call with Christine regarding Objections to Tyson's Exhibit and Deposition Designations and her changes to the same; receipt of evil copies of Brothers pleadings on Fox Objections; receipt of Tyson's Witness List, Exhibit List and Deposition Designations in Brothers	11.50
9/28/2007	CAM	Editing Witness List for Brothers; editing Brother's Exhibit List; reviewing documents for additional exhibits; calculating Brothers' damages; telephone call to Christine regarding information for damages; preparing objections to Tyson's Exhibit in Fox; drafting email to Christine with Brothers pleadings for her review; telephone call with Christine regarding the changes to Brothers Witness and Exhibits List and Statement of Damages; Objections to Fox Exhibits listed by Tyson and objection to Tyson's deposition designations in Fox; editing all pleadings; preparing objections to Tyson's Deposition Designations and Counter Designations in Fox; receipt of e-filed Tyson's Witness List, Exhibit List, and Deposition Designation in Brothers; receipt of Objections in Fox by Tyson, Receipt of our e-filed pleadings	11.60

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
10/1/2007	CAM	Reviewing Tyson's Witness and Exhibit Lists in Brothers; receipt of email from Mueller on Objections filed in Fox; telephone call to Christine regarding email from Mueller and my response to the same; drafting reply email to Mueller regarding Pretrial Order says to serve and file objection in Fox, then meet and confer, etc; receipt of reply email from Mueller regarding his position on Pretrial Order; receipt of Christine's reply email to Mueller regarding why his position is wrong; drafting email to Mueller and David Smith regarding dates Christine and I are available to meet and confer in Fox; receipt of email from Mueller's office regarding scheduling date for conference call to meet and confer; telephone call from Mueller and McIntosh regarding filing Motion for Leave to file Tyson's objections out of time, our position on same; telephone call with Christine regarding call from Mueller; conference call with Christine to McIntosh regarding our position; telephone call with Dan Bartel regarding dates for his testimony for each case; working on subpoenas; preparing for trial in Fox	5.40
10/2/2007	CAM	Conference with Bob Wiggins regarding status of cases, what needs to be done for trial, etc; receipt of email from Mike McIntosh with proposed Motion for Leave to File Objections Out of Time and reviewing the same; telephone call to Christine regarding my problems with proposed motion; receipt of Christine's email with draft of response to Mueller on Motion; conference with Katrina regarding subpoenas; drafting reply email to Christine regarding draft is fine; receipt of email from Christine to Mueller regarding our problems with his motion; receipt of email from Mueller regarding the damages we claim in Fox and Brothers; receipt of Christine's reply email to Mueller; telephone call with Bob Wiggins to Dan Bartel; telephone call from Mueller; conference call with Mueller and Christine regarding his proposal on Motion, his problems with our damages, documents he has not produced, etc.; receipt of email from Mueller with new draft of Motion for Leave to File Out of Time and editing the same; telephone call with Christine regarding our problems with new draft, conference call with Christine and Mike; working on Exhibit and Witness List for Hatchett; receipt of Tyson's e-filed Motion for Leave to File Objections in Fox out of time	3.80
10/4/2007	CAM	Working on Objections to Brothers lists from Defendants	0.30
10/4/2007	CAM	Receipt of Amendment to Brothers' Pretrial Order	0.10
10/4/2007	CAM	Receipt of narrative testimony order in Brothers	0.10
10/4/2007	CAM	Receipt of email from Mueller with Damage Calculations	0.10
10/4/2007	CAM	Receipt of email requesting street address for Brothers	0.10

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
10/4/2007	CAM	Drafting Brothers' objections to Tyson's Exhibits	1.00
10/4/2007	CAM	Drafting Brothers' Objection to Tyson's Deposition Designation and her counter-deposition	2.80
10/5/2007	CAM	Conference with Bob Wiggins regarding Brothers' Objections to Tyson's Exhibits and Deposition Pages, etc	0.30
10/5/2007	CAM	Editing Brothers Objections to Defendants Exhibits	2.70
10/5/2007	CAM	Editing Brothers' Objections to Deposition Designation Designations and our Counter-Designations	2.70
10/5/2007	CAM	Receipt of e-filed copies of our pleadings	0.10
10/5/2007	CAM	Receipt of defendant's pleadings	0.10
10/8/2007	CAM	Telephone conference with Christine regarding objections to counter-deposition designations, conference call with Mueller, our objections she drafted, etc.	0.30
10/8/2007	CAM	Conference with Bob Wiggins regarding our positions on objections, conference call with Mueller, trial preparation, etc	0.30
10/8/2007	CAM	Conference call with Mueller, Christine and Bob Wiggins regarding meet and confer on Fox objections, meet and confer on Motions in Limine, discussions on subpoenas for clients, etc	3.80
10/8/2007	CAM	Conference with Bob Wiggins regarding Motions in Limine	0.30
10/8/2007	CAM	Telephone call with trial witnesses, etc and preparing for trial	1.00
10/9/2007	CAM	Receipt of email from Bob Wiggins regarding information for Fox jury charges	0.10
10/9/2007	CAM	Voice mail from Christine	0.10
10/9/2007	CAM	Receipt of email from Christine regarding video tape of Phillips deposition, etc	0.10
10/9/2007	CAM	Receipt of Notice of Filing transcript of August 30th hearing	0.10
10/9/2007	CAM	Receipt of email from Christine with copy of 3rd Circuit Opinion denying	0.10

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		Tyson's Motion for Rehearing in DeAsencio	
10/9/2007	CAM	Drafting email to Christine and Bob Wiggins regarding time for Brother's conference call on Thursday	0.10
10/9/2007	CAM	Receipt of reply email from Christine	0.10
10/9/2007	CAM	Conference with Bob Wiggins regarding conference call and witness information	0.10
10/9/2007	CAM	Drafting email to Mueller regarding conference call time	0.10
10/9/2007	CAM	Receipt of reply email from Mueller regarding confirming call	0.10
10/9/2007	CAM	Telephone call from Dan Bartel regarding witness schedule	0.20
10/9/2007	CAM	Telephone call from David Smith regarding Chris Mitchell filing Notice of Appearance	0.20
10/10/2007	CAM	Receipt of Bob's email to Christine regarding jury charges; voice mail from Bob Wiggins regarding questions on jury charges; receipt of Bob's email to Mueller on jury charges; conference with Bob regarding jury charges, voir dire and damages; receipt of Mueller's reply email regarding status of him providing proposed jury charges; receipt of letter from Mueller with copy of Tyson's exhibits for Fox case; receipt of email from Mueller with copy of proposed jury instructions and verdict form; drafting email to Christine regarding conference to talk about Mueller's proposed jury charges; drafting Voir Dire; reviewing Mueller's proposed charges and verdict form; receipt of email from Bob with changes to Mueller's Pretrial information to jury; conference call with Bob and Dan Bartel; receipt of email from Mueller regarding refusing to agree to accept trial subpoenas and putting witnesses on call; receipt of email from Christine regarding Mueller's refusal to put witnesses on call; drafting reply email to Christine; reviewing Judge Hopkins' website for her standard Voir Dire and editing our Voir Dire to comply with the same; attempting to contact witnesses	4.80
10/11/2007	CAM	Telephone call with Bob Wiggins regarding jury charges and Motions in Limine; conference call with Christine, etc; receipt of email from Bob Wiggins with his proposed changes to Tyson's jury charges; editing changes Bob made; drafting email to Christine regarding jury charges; telephone call to Christine regarding changes she wants to make to jury charges; preparing objections to Tyson's Exhibit Lists in Hatchett; preparing Objections to Tyson's Deposition Designations in Hatchett; telephone conference with Bob	11.10

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		regarding changes to jury charges; conference call with Christine, Bob Wiggins and Mueller regarding meet and confer and jury charges; telephone conference with Christine regarding voir dire and jury charges; reviewing exhibits to send to Mueller; drafting email to Mueller; telephone call with Janette Masters regarding subpoenas for her testimony; telephone call with Teresa Brothers; telephone call with Angela Hatchett; receipt of email from Bob Wiggins regarding Motions In Limine; receipt of email from Christine; editing Hatchett objections; telephone call from Bob Wiggins regarding jury charge research; receipt of Notice of Appearance of Chris Mitchell; editing Voir Dire questions; drafting email to Christine with draft of objections in Hatchett to Tyson's exhibits; telephone call with witnesses; drafting Counter-Deposition Designations in Hatchett	
10/12/2007	CAM	Receipt of email from Christine regarding objections to Exhibits; receipt of Bob Wiggins emails on jury charges; receipt of Christine's reply emails; receipt of emails to Mueller regarding dropping the 2 minute production line claim for Fox; receipt of Mueller's reply email; receipt of time computer disks for time records from Albertville; conference with Bob Wiggins regarding Motions in Limine, jury charges, etc.; reviewing case law for jury charges; drafting email to Mueller regarding Motions in Limine we are filing; receipt of reply email from Mueller regarding conference call on same; editing Voir Dire; editing Motion in Limine on use of deposition testimony; receipt of Order granting Notice of Appearance for Mitchell; conference call with Mueller and Bob Wiggins regarding jury charges and Motions in Limine; editing Motions in Limine; conference call to clerk left voice mail regarding extension; drafting counter-depositions objections for Brothers; telephone call with Christine regarding conference call, Motion in Limine, etc., telephone call from Judge Hopkins' clerk regarding have until Monday at 9:00 to file jury charges; drafting email to all attorneys regarding extension on jury charges; making final corrections on Motions in Limine for filing; receipt of e-filed versions of our motions; receipt of Tyson's Motions in Limines in Fox; telephone call with Bob Wiggins regarding jury charges and Motions in Limine responses; receipt of email from Mueller regarding telephone number for weekend work on jury charges	11.00
10/12/2007	CAM	Receipt of Tyson's Objections in Brothers	0.10
10/13/2007	CAM	Downloading Tyson's Briefs and Evidentiary Submissions in Support of Motions in Limine and the Motions in Limine; telephone conference with Bob Wiggins regarding jury charges; Motions in Limine, etc.; drafting emails to Bob Wiggins with copies of Motions and Briefs; receipt of email from Mueller regarding damages; reviewing Tyson's Motions in Limine and working on responses	3.50

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
10/14/2007	CAM	Telephone call with Dian regarding jury instructions; telephone call with Bob Wiggins regarding information needed, Motions in Limine, etc; telephone conference with Dian regarding additional information needed by Bob Wiggins; receipt and review of Bob's email to Mueller regarding proposed jury instructions; receipt of email from Mueller regarding his problems with our draft of jury instructions; telephone call with Bob regarding Mueller's email; drafting reply email to Mueller regarding our position on jury charges and suggestions to correct his perceived problems; receipt of reply email from Mueller; drafting reply email to Mueller; receipt of email from Mueller regarding thinks we have a compromise; working on responses to Motions in Limine; receipt of email from Christine regarding the response she is drafting; drafting reply email to Christine regarding argument to add to her response; drafting response to Motion in Limine on Yarbrough testimony; drafting response to Motion in Limine on Witnesses; receipt of order on Voir Dire; drafting email to Judge Hopkins to send Voir Dire; voice mail from Janette Masters; telephone call to Janette	9.30
10/15/2007	CAM	Telephone call with Dian regarding Mueller filed Joint Proposed Jury Charges last night; receipt and review of filed Joint Proposed Jury Charges; receipt of Mueller's email regarding reason he filed before sending final draft to us to review; telephone conference with Bob regarding jury charges Mueller filed without our review, status of Oppositions to Motions in Limine, etc.; drafting and editing Fox Opposition to Motion in Limine on Witnesses Not Disclosed and Opposition to Motion in Limine on Yarbrough Testimony; telephone call with Christine regarding information needed for Oppositions; telephone call from Judge Hopkins' law clerk regarding copy of transcript from May 28, 2003 hearing; drafting email to Christine regarding transcript; conference call with Bob regarding Oppositions to Motion in Limine; telephone call from Judge's court reporter regarding daily copy of trial transcript; drafting email to Judge Hopkins' clerk regarding attaching hearing transcript she requested; working on witness subpoenas; telephone call with Judge Hopkins' docket clerk regarding questions on Exhibit labels; telephone call with Christine regarding oppositions to MIL; receipt of Christine's Opposition to Motion to Limine for filing; drafting email to Christine with my Opposition for her review; receipt of email from Christine regarding her changes; making final corrections to Oppositions for filing; receipt of email from Christine with Brothers Unresolved Objections for filing; receipt of e-filed copies of Fox Oppositions and Brothers Unresolved Objections; receipt of copy of Tyson's Oppositions to Fox's Motion in Limine; receipt of copy of Tyson's Unresolved Objections in Brothers; telephone call with M.H. Fox regarding trial preparation, appointment, etc.; receipt of order granting Motion to Seal; receipt of copies of emails to Judge Hopkins with WordPerfect versions of the pleadings filed today	12.20
10/16/2007	CAM	Receipt of email from Joe regarding daily copy of trial transcript; receipt of	1.50

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<b><i>McGowan, Candis</i></b>			
		email from Bob regarding daily copy; conference with Bob regarding meeting with Fox and witness information, etc.; document numbers, etc; telephone call from Cecil Maldanodo regarding his testimony for case; telephone call with M. H. Fox regarding meeting tomorrow and transportation arrangements, etc.; receipt of email from Mueller regarding witness issue in Fox; receipt of email from Mueller regarding meet and confer in Hatchett; preparing outline of Fox's testimony	
10/17/2007	CAM	Working on Brother's Voir Dire	0.90
10/18/2007	CAM	Working on voir dire for Brothers; receipt of various email from Mueller and Bob's response	1.50
10/19/2007	CAM	Editing Brothers Voir Dire	0.50
10/24/2007	CAM	Preparing for trial; telephone call with Teresa Brothers regarding preparing for trial; telephone conference with Bob Wiggins regarding meeting with Brothers to prepare; reviewing exhibit books for the defendants and exhibit books for the Judge with objections	2.20
10/25/2007	CAM	Preparing for Brothers Trial; conference call with Bob Wiggins and Christine regarding Motions in Limine and jury charges; preparing Objections to Fox Deposition Designations and Counter Designations in Brothers and Hatchett	9.80
10/26/2007	CAM	Preparing for Brothers trial; receipt of email from Mueller regarding Hatchett jury instructions; conference with Bob Wiggins; drafting reply instructions; working on witnesses; reviewing deposition outlines; telephone conference with Christine regarding pleadings she is filing today; conference with Bob Wiggins regarding Hatchett Motion in Limine; reviewing deposition transcript to prepare for Brothers trial	3.50
10/27/2007	CAM	Trial preparation for Brothers; calling witnesses; meeting with Bob Wiggins regarding trial strategy; reviewing depositions in case to prepare for cross examinations; receipt of emails from Mueller' telephone call with Christine; receipt of emails from Christine	9.00
10/28/2007	CAM	Preparing for trial; meeting with Bob regarding witness order; meeting with Teresa to prepare for trial; telephone calls to witnesses; receipt of Orders on Motions in Brothers'; telephone call to Bob on Motion in Limine; outlining 3rd day of Brothers deposition testimony; editing witness outlines; preparing subpoenas for witnesses; telephone call with witnesses; editing outlines; final trial preparation	11.50

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
10/29/2007	CAM	Preparing for and attending first day of trial of Brothers case; telephone call to witnesses; preparing for second day of trial in Brothers; voice mail to Christine; preparing for second day of trial; reviewing Teresa's time records to prepare for cross; preparing response to objections to exhibits	17.60
10/30/2007	CAM	Preparing for and attending second day of trial and conference with Judge on settlement; meeting with witnesses; telephone call with Christine regarding legal arguments; telephone call with Bob Wiggins regarding questions for witnesses; preparing regarding direct of Brothers; preparing for cross of Blackmon, preparing for reading of depositions, etc.	12.50
10/31/2007	CAM	Preparing for and attending 3rd day of trial and charge conference; preparing for cross of Blackmon; telephone conference with witnesses; preparing for next day of trial	17.40
11/1/2007	CAM	Preparing for 4th day of Brothers' trial; attending last day of trial and receiving jury verdict; telephone conference with co-counsel; telephone call with Christine regarding the verdict; receipt of e-filings from Tyson	13.90
11/12/2007	CAM	Working on Fee Petition; receipt of email from Christine; drafting reply email to Christine	0.60
11/14/2007	CAM	Meeting with Christine regarding Fee Petition, Tyson won't agree to Motion for Extension on filing Fee Petition, etc.; conference with Bob Wiggins regarding Fee Petition; drafting email to Christine regarding our position on Fee Petition; receipt of Mueller's email to Christine regarding Tyson will now agree to Motion to Extend Filing Fee Petition	0.90
11/16/2007	CAM	Receipt of Order granting Motions for Extension to File Fee Petition in Hatchett and Brothers; telephone call from Roger regarding information for his time for fee petition; working on time records from 1999 to 2002 for fee petition; conference with Bob Wiggins regarding our position on Rule 58/59 issues; receipt of Tyson's Response to Motion for Declaratory Judgment	2.30
11/19/2007	CAM	Receipt of Bob Wiggins' email to Christine regarding Reply to Motion for Declaratory Judgment; receipt of Christine's reply email to Bob with response to his question, conference with Bob Wiggins regarding reply and asking for extension; drafting email to Christine regarding requesting extension from Mueller; receipt of email from Christine regarding Mueller agreed to extension request	0.60
11/20/2007	CAM	Preparing and editing Motion for Extension to file reply to Tysons' Opposition to Declaratory Judgment; telephone call with Christine regarding motion and	1.40

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		correction to same; making final corrections to motion for extension for e-filing same; receipt of e-filed motion; receipt of order granting motion; receipt of fax from Roger with information for Fee Petition	
11/21/2007	CAM	Working on Reply to Tyson's Opposition to Motion for Declaratory Judgment; working on Fee Petition and time for former firms	2.30
11/26/2007	CAM	Working on Fee Petition; receipt of email from Christine regarding information for Fee Petition	1.10
11/27/2007	CAM	Working on Fee Petition; receipt of email from Dan with Gardner's new time entries, working on Reply to Tyson's Opposition to Motion for Declaratory Judgment; receipt of email from Christine with questions on Fee Petition; drafting reply email to Dan regarding time entries from Gardner; drafting reply email to Christine regarding her time entry questions; receipt of email from Christine regarding fee her draft Declaration; telephone call with Christine regarding Fee Petition and Declarations, etc.	2.00
11/27/2007	CAM	Researching and drafting reply to Tyson's Opposition to Declaratory Judgment; telephone call with Bob Wiggins regarding draft of reply and him completing the same; receipt of email from Evangeline regarding request for Extension to File Tyson's Appeal	4.80
11/30/2007	CAM	Telephone call with Bob Wiggins regarding reply Motion	2.10
11/30/2007	CAM	Telephone call to Bob Wiggins regarding Reply Brief draft and cases left for him, etc.; telephone call with Christine regarding Tyson wants an extension to file their appeal in Brothers and Hatchett cases, etc.; telephone call to Bob Wiggins regarding he has emailed draft of Reply Brief to me to review; receipt of email from Bob Wiggins regarding draft of Reply Brief and reviewing the same; telephone call to Bob Wiggins regarding Reply Brief is fine to file, Tyson's request for extension to appeal, etc.; receipt of Bob's email to Christine and me regarding opposing Tyson Motion to Extend Time to Appeal; receipt of Bob's email to Christine regarding opposing Tyson's Motion to Extend Time to Appeal; receipt of Christine's email to Paschal regarding plaintiffs cannot agree to extend their time to appeal; receipt of Tyson's Motion to Extend Time to Appeal; receipt of copy of email to Judge; receipt of briefing order on Tyson's Motion	2.00
12/1/2007	CAM	Telephone call with Dan regarding fee information	0.60
12/3/2007	CAM	Working on fee petition	3.50

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

018435-0001      Brothers, Teresa  
 Tyson Foods, Inc. (Albertville)

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
12/3/2007	CAM	Working on Fee Petition; telephone call from Debra Gardner regarding PJC's fee requests; receipt of emails from Christine with their fee information and Jay's; editing Opposition to Tyson's Request for Extension to File Appeal; receipt of e-filed Opposition to Tyson's Motion to Extend Time to Appeal	3.50
12/4/2007	CAM	Receipt of Order Denying Motion to Extend Time to File Appeal; editing time and calculating time and expenses for Fee Petition; editing Fee Petitions; receipt of e-filed Fee Petitions	10.50
12/5/2007	CAM	Telephone call from Judge's office regarding conference call with Judge and time for same; conference with Bob regarding conference call with Judge Hopkins, reasons for my changes to Fee Petition, etc.; conference call with Judge Hopkins, Bob Wiggins and David Smith regarding pending Motion for Fees, pending Motion for Declaratory Judgment and the Judge's questions and thoughts on same; receipt and review of Notice of Appeal filed by Tyson; conference with Bob Wiggins regarding Notice of Appeal; drafting email to Christine regarding questions raised by Judge Hopkins; receipt of email from Debra Gardner regarding questions on Fee Petition; drafting reply email to Debra Gardner regarding answers to her questions on Petition	1.10
12/6/2007	CAM	Receipt of notice from Court of receipt of Appeal Fees; receipt of notice from Court of transmission of Notice of Appeal; telephone call with Christine regarding Judge's questions on Fee Petition and D.J. Motion and our response to same	0.50
12/7/2007	CAM	Receipt of email from Christine regarding issue on D.J. for Judge's questions	0.10
12/11/2007	CAM	Receipt of Notice from Clerk of Court regarding case number for Appeals Court	0.10
12/13/2007	CAM	Receipt of Order deferring ruling on attorneys' fees; voice mail from David Smith regarding questions on Motion for Declaratory Judgment	0.30
12/14/2007	CAM	Executing Notice of Appearance for filing for 11th Circuit	0.10
12/17/2007	CAM	Receipt of Transcript Request by Tyson for trial transcript for appeal	0.20
1/2/2008	CAM	Receipt of letter from 11th Circuit scheduling case for Mediation; conference with Bob Wiggins regarding Mediation, briefing schedule status, etc.; telephone call to 11th Circuit Mediation regarding request to excuse Teresa from Mediation, Hatchett case and possibility of joint Mediation, etc.; receipt of email from Christine regarding Mediation and due dates for statement; conference with Bob Wiggins regarding request from Mediation to have Teresa	2.00

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		on call; telephone call with 11th Circuit docket clerk regarding Briefing Schedule, etc.; drafting email to court reporter regarding status of filing transcript; receipt of reply email from Court Reporter regarding status of filing transcript; receipt of reply email from Court Reporter regarding transcripts will be filed today; conference with Bob Wiggins regarding information from docket clerk on briefing scheduling; telephone call to Mueller regarding Mediation of case, request from 11th Circuit Mediator, information on filing of transcripts, etc.; telephone call with Christine regarding Mediation Statement, request from Mediator and my call with Mueller; drafting email to Bob Wiggins, Joe and Christine regarding Mueller's position on Mediation; voice mail to Teresa regarding Mediation Order from 11th Circuit	
1/3/2008	CAM	Conference with Bob Wiggins regarding my call with Mediator about Teresa's work; voice mail from Teresa; telephone call with Teresa regarding Mediation scheduled by 11th Circuit, authority for settlement, her work number, etc.; conference with Bob Wiggins regarding authority from Teresa; telephone call with Christine regarding I will draft Mediation Statement; receipt of filing of transcripts by Court Reporter	1.30
1/4/2008	CAM	Conference with Bob Wiggins regarding Mediation scheduled by 11th Circuit and the Statement, etc.; receipt of review of Tyson's Civil Appeals Statement, Transcript order and Certificate of Interested Parties pulling documents for use in drafting Confidential Mediation Statement and drafting same	0.80
1/7/2008	CAM	Drafting procedural background and history of case for Confidential Mediation Statement; receipt of email from Mueller regarding never received copy of 11th Circuit Mediation Notice; receipt of Christine's reply email to Mueller with copy of Notice; drafting email to Mueller regarding Tyson's position on combining Brothers and Hatchett Circuit Mediations; receipt of email from Mueller regarding calling the Mediator Caleb Davies regarding Mueller's request for a continuance of Mediation, reasons, Tyson's position on settlement, new date for assessment call and position statement, etc.; drafting email to Bob Wiggins, Joe and Christine regarding the results of conference call with the Mediator and new date for assessment call, etc.; telephone call with Christine regarding Tyson's position on Mediation, date for Assessment call and Confidential Mediation Statement	2.80
1/10/2008	CAM	Receipt of Tyson's response to 11th Circuit's Jurisdiction Questions	0.20
1/14/2008	CAM	Receipt of Notice from 11th Circuit regarding case docket and date Tyson's brief is due and calendaring the same	0.20
1/17/2008	CAM	Receipt of email from Christine with information for Mediation Statement; receipt of email from Court Reporter regarding transcripts filed with Court	0.30

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
1/18/2008	CAM	Working on Mediation Statement	0.80
1/22/2008	CAM	Drafting and editing Mediation Statement; drafting email to Bob and Christine with Statement for their review; receipt of email from Christine with her changes; editing Mediation Statement; drafting email to 11th Circuit Mediator regarding Brother's Confidential Statement	2.80
1/23/2008	CAM	Voice mail from Caleb Davies regarding questions he has for use in Mediation; telephone call to Caleb Davies regarding discussed past settlement options and issues with case; telephone call with Christine regarding what Mediator needed; drafting email to Davies regarding requested information; receipt of Order denying Motion for Declaratory Judgment; telephone call with Christine regarding Order denying Declaratory Judgment; receipt of Order entering final Judgment; receipt of transmittal letter to 11th Circuit; telephone call with Christine regarding Orders and Mediation tomorrow; preparing for Mediation	1.90
1/24/2008	CAM	Conference with Bob regarding Mediation and his thoughts on same; participating in 11th Circuit Mediation Assessment conference call with Mediators Davies and Roland; conference with Bob regarding results of Mediation	0.60
1/25/2008	CAM	Receipt of Tyson's designation of materials for inclusion in the record; drafting email to Christine and Bob regarding Tyson's designation; receipt of Tyson's Notice of Appeal from the Final Judgment	0.50
1/28/2008	CAM	Receipt of e-notice of transmission of Notice of Appeal	0.10
2/1/2008	CAM	Conference with Bob regarding Mueller's position on moving date brief is due with Motion to Consolidate, Mueller's question on us appealing denial of Motion for Declaratory Judgment, etc	0.20
2/4/2008	CAM	Voice mail from Christine regarding 11th Circuit called about Motion to Consolidate; telephone call with Christine regarding Motion to Consolidate and call from the 11th Circuit; our position, etc.; conference with Katrina on Record Designation; receipt of Christine's email on Record Designation; reviewing Tyson's designations; research on 11th Circuit Rules on Appendix; drafting email to Mueller regarding date our designation are due and 11th Circuit rules; receipt of Notice of Appeal fees paid by Tyson; receipt of Notice of docketing appeal from 11th Circuit; receipt of Notice from 11th Circuit with Appeal case number	1.50
2/5/2008	CAM	Receipt of Notice of Tyson's Second Order of Transcripts for trial	0.10

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
2/6/2008	CAM	Receipt of email from Christine regarding 11th Circuit's call on Motion to Consolidate; conference with Bob Wiggins regarding position on Motion to Consolidate; drafting reply email to Christine regarding our position on Motion to Consolidate; conference with Bob Wiggins regarding letter from Mueller on designation of record for appendix and our position; receipt of Bob's email to Mueller regarding R-30-1 of 11th Circuit prohibits his documents for appendix; receipt of Mueller's reply email to Bob	0.70
2/7/2008	CAM	Receipt of Bob's email to Mueller regarding documents not proper for appendix	0.10
2/8/2008	CAM	Receipt email from the court reporter with changed page for 11-1-07 transcript and reviewing the same; drafting email to Bob regarding new page from court reporter	0.30
2/13/2008	CAM	Drafting email to Christine regarding status of talks with clerk about Motion to Consolidate; telephone call from Christine regarding status of her talks with clerk, will confirm tomorrow that we don't have to file a response; receipt of court reporters Notice of Transcript is complete	0.40
2/19/2008	CAM	Receipt of 11th Circuit Order granting Motion to Consolidate with Hatchett and setting date brief due; telephone call with Christine regarding Order	0.30
3/3/2008	CAM	Conference with Bob regarding dates briefs are due; drafting email to Mueller regarding date briefs are due; receipt of email from Mueller regarding due date	0.40
3/10/2008	CAM	Receipt of email from Mike McIntosh regarding defendant is going to file a Motion to Consolidate appeal with Hatchett; we will oppose same; receipt of email from Christine regarding McIntosh's email and Tyson's position; drafting reply email to Christine and Bob regarding my thoughts on why to oppose; receipt of Bob's email regarding his questions and thoughts; receipt of Christine's reply email; drafting email to Christine and Bob regarding additional thoughts on motion; receipt of Bob's reply email; conference with Bob regarding our position; drafting email to Christine regarding we oppose Motion	0.80
3/11/2008	CAM	Receipt of email from Christine regarding agrees with our position; telephone call with Christine regarding notifying Tyson of our position; receipt of Christine's email to McIntosh regarding we oppose the Motion to Consolidate the appeal with Hatchett	0.40
3/17/2008	CAM	Receipt of Motion to Consolidate with Hatchett	0.20

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
3/25/2008	CAM	Telephone call to Dian regarding draft of Opposition to Motion to Consolidate, information for same, etc.; telephone call with Katrina regarding research needed for Opposition, additional pleadings Bob needs from file, etc; telephone call with Bob Childs regarding Opposition draft, reason for my arguments etc.; telephone call from Bob regarding Opposition draft, reason for my arguments, etc.; telephone call from Bob regarding questions for Bob's edited draft of Opposition, etc.; receipt of Bob's edited draft of Opposition to Motion to Consolidate and editing the same; telephone call with Bob regarding changes to Opposition, additional information, etc.	1.50
4/1/2008	CAM	Conference with Bob Wiggins regarding Fee Petition	0.30
4/4/2008	CAM	Receipt of Notice from 11th Circuit clerk regarding court has jurisdiction to consider appeal	0.20
4/11/2008	CAM	Telephone conference with Katrina regarding date the Fee Petition is due, what needs to be done for same, information Bob Wiggins needs for Petition, etc.; telephone call to Bob Wiggins regarding due date for Fee Petition, what needs to be done, etc.; telephone call to Katrina regarding information that Bob Wiggins needs for working on the Fee Petition, where located, etc.; telephone call to Bob Wiggins regarding confirming he received the information, etc.	0.90
4/14/2008	CAM	Conference with Bob Wiggins regarding Fee Petition and how the hours are to be divided between the 3 cases, etc.; editing Motion for Fees; calculating time and expenses; telephone call with Christine regarding confirming information for her fees; making final corrections to Fox Motion for Fees and Expenses; receipt of e-filed Motion for Fees and Expenses	4.50
4/15/2008	CAM	Receipt of email from the docket clerk regarding needs parties to propose a schedule on Fee Petition submissions; conference with Bob Wiggins regarding proposal on schedule; telephone call with Christine regarding proposal for schedule; drafting email to Mueller regarding our proposal for submission schedule; receipt of email from Mueller regarding he will get back with me there response to proposal	0.80
4/18/2008	CAM	Receipt of email from Mueller regarding Tyson is dismissing appeal and he suggests handling fees with Fox Petition; conference with Bob Wiggins regarding email and proposal; telephone call with Christine regarding email and proposal	0.30
5/8/2008	CAM	Receipt of email from Mueller with Preliminary Objections to our Document Request for Fee Petition; receipt of email from Christine regarding her thoughts on Tyson's objections; receipt of Bob Wiggin's reply email to	0.80

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		Christine regarding Motion to Compel; conference with Bob Wiggins regarding objections; drafting email to Christine regarding Fee Petition and amending the same	
5/10/2008	CAM	Receipt of email from Mueller regarding status of Motion to Compel; forwarding email to Bob Wiggins	0.10
5/12/2008	CAM	Voice mail to Teresa Brothers regarding status of appeal; telephone call from Teresa regarding explained Tyson dropping appeal and status, etc	0.40
5/19/2008	CAM	Receipt of Order from 11th Circuit dismissing appeal; receipt of email from District Court regarding appeal dismissed	0.20
5/21/2008	CAM	Receipt of email from Christine regarding Mueller's proposed briefing schedule; telephone conference with Bob Wiggins regarding briefing schedule; receipt of Order on Motion to Compel Briefing schedule receipt of email from Christine with Fee Petition documents; receipt of e-filed Joint Motion for Proposed Briefing Schedule	1.00
5/22/2008	CAM	Receipt of Order setting briefing schedule on Motion to Compel	0.10
5/27/2008	CAM	Receipt of email from Dian regarding the deadlines for Motion for Fees; receipt of Order from 11th Circuit dismissing the appeal; receipt of letter from Christine with Fee Petition documents	0.50
6/3/2008	CAM	Conference with Bob Wiggins regarding Brief for Fees and affidavits; conference with Bob Childs regarding declarations for Fee Petition; receipt of Bob Child's email to Bruce Rogers with information on Fee Petition for affidavit; telephone call from Bob Childs regarding questions on history of case for briefing for Fee Petition, etc.; receipt of email from Bob Childs with affidavit draft; receipt of emails from Bob Childs to other counsel for affidavits	1.00
6/4/2008	CAM	Working on Brief and documents for Fee Petition; voice mail to Bruce Rogers; telephone call with Bruce Rogers regarding his affidavit, information about case, etc	0.80
6/5/2008	CAM	Receipt and review of Defendant's Opposition of Plaintiff's Motion to Compel Production of Defendant's Fee Payments and Itemization of time	0.30
6/10/2008	CAM	Working on Declarations and Brief for Fee Petition; telephone call with Christine regarding she will handle the Reply to Tyson's Opposition to Motion to Compel	5.60

**Wiggins, Childs, Quinn & Pantazis, P.C.**  
**Fee Application**

**018435-0001      Brothers, Teresa**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
6/13/2008	CAM	Working on Brief for Fee Petition; conference with Bob Wiggins regarding Brief; conference with Rusty regarding his assignments on Brief; telephone call with Christine regarding her Fee Petition, changes she needs to make to same, etc.; conference with Bob Childs regarding Whatley declaration; telephone call from Roger regarding Fee Petition Declaration	6.10
6/14/2008	CAM	Working on Evidentiary Submission for Fee Petition; drafting Brief, drafting Affidavits, etc.	5.80
6/15/2008	CAM	Drafting my declaration; editing time records for last 2 months; drafting and editing brief to support Fee Petition, etc	9.50
<b>Total</b>			<b>478.10</b>

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Washington, Katrina</i>			
8/15/2007	KW	Conference with Candis regarding finding Collective Bargaining Agreement and locating the same	0.30
9/14/2007	KW	Witness and Exhibit List - locate personnel files and other documents needed for the Witness and Exhibit List	0.50
9/19/2007	KW	Locate deposition of named plaintiffs and documents produced by Tyson Foods	1.00
9/20/2007	KW	Locate documents listed on plaintiff's and defendant's witness and exhibit list	1.50
9/21/2007	KW	Plaintiff's Witness and Exhibit List - Go through personnel files and other documents for exhibits	1.20
9/28/2007	KW	Editing Plaintiff's Statement of Damages; conference with Candis regarding pleading is ready to be e-filed; e-file Plaintiff's Statement of Damages; editing Plaintiff's Witness and Exhibit List; conference with Candis regarding pleading is ready to be e-filed; e-file Plaintiff's Witness and Exhibit List	2.00
10/1/2007	KW	Reply email from Candis regarding use names on Witness and Exhibit list for witnesses	0.10
10/1/2007	KW	Draft email to Candis re: serving subpoenas; locate witnesses, etc.	0.10
10/1/2007	KW	Draft subpoenas (12), draft supplemental sheet with subpoenas; locate addresses for subpoenas; preparing all trial subpoenas	7.00
10/2/2007	KW	Locate witnesses for subpoenas; receipt of list from Candis regarding who we are serving with subpoenas; telephone call to clerk regarding amount for mileage fees and witnesses fees for subpoenas; calculate mileage fees telephone call to Rhett Wood regarding serving subpoenas	7.00
10/3/2007	KW	Calculate mileage fees for witnesses; draft email to Sharon regarding mileage fees; draft email to Sharon regarding checks for mileage and witness fees; preparing documents for trial	5.00
10/5/2007	KW	E-file Objections to Tyson's Deposition Designations	0.30
10/15/2007	KW	Trial preparation - subpoenas, Motion in limine to Exclude Evidence of Pre-shift Activities, Motion in Limine to Exclude Lay Witness Testimony and	3.17

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Washington, Katrina</i>			
		Preclude Plaintiff from calling Witnesses Whose Identities Were Not Properly Identified; Brothers Statements of Unresolved Objections; make corrections to all motions and e-file to the U.S. District Court and email to all counsel and U.S. District Court Judge Hopkins	
10/17/2007	KW	Brothers' Trial - receipt of email from Candis regarding start draft of Voir Dire	1.25
10/19/2007	KW	Brothers - Prepare notebooks for Judge Hopkins and Candis; prepare Voir Dire in Brothers	7.48
10/25/2007	KW	Fox trial - preparation for Brothers trial, get exhibit notebooks for defendant and defense counsel	3.80
10/26/2007	KW	Brothers - deliver exhibit notebooks, and demonstratives exhibits; prepare for next's weeks trial	3.80
10/27/2007	KW	Brothers - trial preparation, copies of deposition transcript; conference with Kim Hooks, IT person, and Dian regarding exhibits for presentation	7.50
10/28/2007	KW	Brothers - trial preparation, making copies of exhibits; gather all items needed for trial	10.05
10/29/2007	KW	Brothers trial preparation and attending trial; preparation for the next day, receipt of Orders from Judge Hopkins	14.00
10/30/2007	KW	Brothers trial preparation and attending trial; preparation for the next day, receipt of Orders from Judge Hopkins; receipt of transcript from court reporter	13.80
10/31/2007	KW	Brothers trial preparation and attending trial, preparation for next day, receipt of Orders from Judge, jury conference	13.80
10/31/2007	KW	Legal research; pull cases	2.50
11/1/2007	KW	Preparing for the last day of Brothers trial; attending last day of Brothers trial	13.90
11/29/2007	KW	Receipt of email from Dan Roberts regarding converting Tyson time records into a spreadsheet; receipt of email from Candis regarding Tyson time records; receipt of reply email from Dan Roberts regarding time records; email to Debbie in John Saxon's office regarding converting time; receipt of reply email from Debbie Burt regarding Tyson time records	0.50
11/30/2007	KW	C	0.10

**Wiggins, Childs, Quinn & Pantazis, P.C.**  
**Fee Application**

**018435-0001      Brothers, Teresa**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Washington, Katrina</i>			
11/30/2007	KW	Receipt of email from Dian Jernigan regarding Plaintiff's Reply in Support of Declaratory Relief was filed today	0.10
12/3/2007	KW	Receipt of Plaintiff's Opposition to Extension of Time To File Appeal	0.10
12/3/2007	KW	Editing time entries entries for fee petition	0.50
12/4/2007	KW	Enter and correct time for fee petition	0.50
12/13/2007	KW	Receipt of Order from Judge Hopkins regarding deferring ruling on attorneys' fees until after appeal	0.20
12/18/2007	KW	Receipt of U.S. Court of Appeals for the Eleventh Circuit Appearance of Counsel Form signed by Robert L. Wiggins, Jr.; Candis A. McGowan, and Ann K. Wiggins	0.20
<b>Total</b>			<b>123.25</b>

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Wiggins, Ann K.</i>			
10/3/2007	AKW	Research model jury instructions and FLSA instructions for Robert L. Wiggins. Search other districts and circuits model jury instructions. Discuss with Robert L. Wiggins.	2.00
10/5/2007	AKW	Research on various issues for pretrial motions including duty to designate under FRCP 30(b)(6), number of persons who can be designated, read practice treatises and cases. Meet and Discuss with Robert L. Wiggins.	3.00
10/16/2007	AKW	Research for limine motions, research on 30(B)(6) and binding effect	5.25
10/20/2007	AKW	Can't mention in opening facts or theories not ruled on by court. Research judicial estoppel for defendant's use of plaintiffs' expert report and study.	2.50
10/25/2007	AKW	Research whether regulations can be used at trial on cross examination and whether they can be used to rebut factual assertions of defendant regarding first act to last, de minimis, whether regs can be used if no wilfulness. Research purpose of the regulations. Discuss with Robert L. Wiggins.	2.50
11/30/2007	AKW	Discuss declaratory judgment brief with Robert L. Wiggins, read draft, research presumption that jury follows court's instructions, findings and special verdicts.	3.25
12/4/2007	AKW	Discuss fee issues with Robert L. Wiggins.	1.00
<b>Total</b>			<b>19.50</b>

**Wiggins, Childs, Quinn & Pantazis, P.C.**  
**Fee Application**

**018435-0001      Brothers, Teresa  
 Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Wiggins, Robert L.</i>			
2/9/2007	RLW	Meeting on trial prep and responsibilities; discuss status of discovery; read depositions	2.80
2/10/2007	RLW	Read depositions to determine trial prep and discovery issues	4.00
2/11/2007	RLW	Read depositions and discovery to plan trial preparation	3.50
2/12/2007	RLW	Outline trial prep; outline client's facts	5.20
2/13/2007	RLW	Read depositions and outline trial prep issues	3.70
2/20/2007	RLW	Review status of discovery; outline trial issues needing further work	2.00
4/24/2007	RLW	Review and outline discovery to date; outline further discovery needed; draft 30(b)(6) deposition notice; identify supervisors that need to be deposed; draft deposition notices; discuss trial prep work to be done with co-counsel; draft several e-mails on work to be done	8.50
4/25/2007	RLW	Meeting on trial prep with co-counsel; further review of discovery and documents produced to date by Tyson	5.50
6/27/2007	RLW	Several meetings with on trial prep with co-counsel; outline witnesses needed for trial	2.50
8/21/2007	RLW	Several meetings on trial prep and division of labor for trial prep; prepare for pretrial conference; outline issues for pretrial order	5.30
8/29/2007	RLW	Meeting on trial prep and pretrial conference issues; prepare for court conference	3.00
8/30/2007	RLW	Meeting in preparation for pretrial conference and trial preparation; work on trial prep; outline division of labor/things to be done	2.00
9/6/2007	RLW	Prepare for and attend pretrial conference; outline results of pretrial conference and work that needs to be done; read Tim McCoy deposition and outline useable parts	6.20
9/7/2007	RLW	Outline witnesses and documents to be used at trial; review discovery document production for possible trial exhibits; meeting on trial prep; e-mails	4.00

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Wiggins, Robert L.</i>			
		on various issues	
9/8/2007	RLW	Read and outline useable parts of Whitney Wilson deposition; read and outline Serrano deposition for possible designations	8.30
9/9/2007	RLW	Read and outline possible deposition designations from Schneider; study expert reports of both parties; outline useable parts	9.20
9/10/2007	RLW	Read and outline Dr. Fernandez deposition and report for defendant for possible trial designations and/or cross/exam at trial	12.20
9/12/2007	RLW	Teleconference on settlement; meeting on trial preparation with co-counsel	2.00
9/13/2007	RLW	Continue work on Dr. Fernandez' deposition and cross-exam outline and possible deposition designations; read and outline depositions of defendants' officials for designations on pages pursuant to pretrial order	8.50
9/15/2007	RLW	Read and outline depositions of defendants' officials and expert in order to decide what pages to designate/counterdesignate for trial	6.40
9/17/2007	RLW	Meeting on trial prep; continue trial prep	2.50
9/19/2007	RLW	Meeting on trial prep	1.00
9/20/2007	RLW	Meeting on trial prep and witnesses/document lists and other due dates	2.10
10/2/2007	RLW	Outline Jerry Phillips' deposition as part of trial exam; outline for Phillips; meeting with co-counsel on trial prep	6.80
10/3/2007	RLW	Research and draft jury instructions and various motions in limine issues; study and outline defendant's position in pretrial order; draft e-mail; trial prep; meeting with co-counsel on trial prep	10.70
10/4/2007	RLW	Outline Phillips' deposition and cross-exam outline; work on jury instructions and various motions in limine; meeting on trial prep	12.00
10/5/2007	RLW	Continue trial exam; outlines; integrate documents/exhibit references into outlines work on jury instructions and motions in limines; e-mails to and from Tyson's counsel; trial prep meeting	11.40
10/6/2007	RLW	Read and outline defendant's depositions; continue work on Phillips' exam outline; outline useful exhibits; study backpay calculations; overall trial prep	9.00

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Wiggins, Robert L.</i>			
10/7/2007	RLW	Trial prep; outline Phillips' deposition and trial exam areas; outline Roderick Jackson's deposition	7.40
10/8/2007	RLW	Continue work on trial exam outline of Jerry Phillips; work on Roderick Jackson's deposition and exam outline; study collective bargaining agreement; meeting on motion in limine and jury instructions; teleconference with defense counsel; meet with co-counsel on trial prep issues; draft and respond to various e-mails on trial prep issues	13.30
10/9/2007	RLW	Continue trial prep and witness exam outlines; work on jury instructions and motions in limine; study DOL regulations	12.50
10/10/2007	RLW	Talk to clients; talk to potential witnesses; work on motions in limine; draft jury instructions from review of DOL regulations; draft and respond to various e-mails; outline direct exams of clients; outline new parts of Jerry Phillips exam; study D'Ascencio transcript and outline parts	13.50
10/11/2007	RLW	Continue work on motion in limine and jury instructions; teleconference with co-counsel; study parts of D' Asencio transcripts; continue work on trial witness cross-exam outlines	9.50
10/12/2007	RLW	Re-draft and respond to defendant's proposed jury instructions; discuss jury instructions with other counsel; draft and edit motions in limine and various e-mails; overall trial prep; read some of cases cited by defendant on jury instructions	13.00
10/13/2007	RLW	Revise and respond to jury instructions; study defendant's motion in limine; outline response to defendant's motions in limine; continue trial prep; outline direct exam of potential witnesses; prepare for Dr. Fernandez cross-exam.; work on backpay calculations; outline parts of defendant's exhibits; study plaintiff's punch-in/punch-out records; outline potential problem areas in client's depositions; work on jury instructions again	12.00
10/14/2007	RLW	Revise jury instructions in light of communications with defendant counsel; continue work on trial witness exam outlines; study punch-in/punch-out records for use at trial	10.60
10/15/2007	RLW	Revise outlines for trial; review response on motions in limine; outline points of reply on motions in limine; review version of jury instructions sent to court; draft revised motion in limine on Harper/Roden 30(b)(6) issue in light of defendant's brief on that issue; outline cross-exam of Phillips as Company spokesman; meeting on trial prep; continue overall trial prep	13.20

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018435-0001      Brothers, Teresa  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Wiggins, Robert L.</i>			
10/16/2007	RLW	Work on Phillips' cross-exam outline; outline direct exam topics for plaintiffs, overall preparation for trial on all three cases; meetings with co-counsel on trial prep issues	13.80
10/17/2007	RLW	Continue trial preparation and cross-exam outlines; several meetings on trial preparation; work on demonstrative exhibits; review parts of videotapes and defendant's orientation DVD	12.70
10/18/2007	RLW	Work on Fernandez' cross exam outline; work on witnesses cross-exam outline based on various exhibits and deposition extracts; work on punch-in/punch-out records for use at trial; overall trial prep; work on courtroom electronics and slide show; draft and respond to e-mails; study motions in limine brief and responses; study defendant's trial exhibits; draft demonstrative exhibit disclosure; work on demonstrative exhibits	13.00
10/19/2007	RLW	Revise motions in limine; continue trial prep and review of defendant's trial exhibits; draft objection to defendant's expert and motion to exclude; teleconference with court; respond to court's orders and requests entered from teleconference; review items being submitted to court; work on electronic aspects of blow-ups; revise parts of cross-exam outline of Phillips	14.20
10/20/2007	RLW	Work on cross-exam outlines; get exhibit blow-ups; several teleconferences with defense counsel; meeting with co-counsel on trial prep; rework direct exam outlines; draft opposition to defendant's demonstrative exhibits; further review of defendant's trial exhibits	10.00
10/21/2007	RLW	Work on electronic presentation of trial exhibits and deposition extracts; meet with Kim Hooks on trial exhibits and Phillips' deposition extracts; revise and edit trial exam outlines for Jerry Phillips; draft various e-mails; draft opening statement outline; work on direct exam points for Fox	8.00
10/24/2007	RLW	Overall trial prep; outline Brothers deposition; revise Phillips cross-exam outline to include transcript cites to Phillips' testimony in Fox; meet with client and witnesses at courthouse	6.50
10/25/2007	RLW	Prepare for and attend status conference in Anniston on how to proceed in Brothers; return to Birmingham and continue trial prep in Brothers; rework Phillips' cross-exam outline; study and outline deposition of defendant's witnesses for Brothers trial; work on punch-in/punch-out records for Brothers; draft demonstrative exhibit disclosure; overall trial prep	14.80
10/26/2007	RLW	Continue trial prep all day; finish outline of Brothers' deposition and exhibits; e-mails to co-counsel; meet on trial prep; study defendant's exhibits and	12.00

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

018435-0001      Brothers, Teresa  
 Tyson Foods, Inc. (Albertville)

Date	Atty	Description	Hours
<i>Wiggins, Robert L.</i>			
		proposed demonstratives; work on expert dispute; research expert issues; rework part of Dr. Fernandez cross-exam outline; read other expert's depositions and reports; study backpay dispute on Brothers	
10/27/2007	RLW	Revise cross-exam outline for Jerry Phillips' examination and integrate cross-references to exhibits and Phillips' testimony in Fox; work on opening statement; talk to client; meet with co-counsel; work on demonstrative exhibit; overall trial prep	13.00
10/28/2007	RLW	Continue overall trial prep; meet with client in preparation for trial; work on electronic displays of exhibits for trial review stream of court orders on various motions and issues	15.60
10/29/2007	RLW	Prepare for and attend trial; pick jury; work on opening statements; meet with clients; work on revisions to Phillips' cross-exam at night; prepare for hearing on expert dispute; teleconference with co-counsel; meet with client and witnesses; prepare for next day of trial at night	15.00
10/30/2007	RLW	Prepare for and attend second day of trial; prepare for next day at night	14.50
10/31/2007	RLW	Prepare for and attend third day of trial attend jury charge conference until late in evening; prepare for next day of trial	17.00
11/1/2007	RLW	Prepare for and attend trial; meet with client	12.50
11/14/2007	RLW	Meeting on fee request	0.50
11/19/2007	RLW	Draft e-mail on declaratory judgment reply brief	0.20
11/30/2007	RLW	Draft reply brief on declaratory judgment; e-mail Christine Webber; talk with Candis McGowan	7.50
12/3/2007	RLW	Review time in case; draft fee affidavit	3.50
			<b>Total</b> 469.60
			<b>Total</b> 1,169.65

**Wiggins, Childs, Quinn & Pantazis, LLC (B'ham)**

The Kress Building  
301 19th Street North  
Birmingham, AL 35203

June 16, 2008

Teresa Brothers

P. O. Box 126  
Douglas, AL 35964

Matter ID: 018435-0001

RE: Tyson Foods, Inc. (Albertville)

**EXPENSES**

	Photocopy	348.60
11/30/2007	Research Expense: West Law: 11/01/07 - 11/30/07	437.93
3/31/2008	Research Expense: Pacer: 01/01/08 - 03/31/08	1.36
3/31/2008	Research Expense: West Law: 03/01/08 - 03/31/08	608.72
4/30/2008	Research Expense: 04/01/08 - 04/30/08	51.00
<b>TOTAL EXPENSES</b>		<b>\$ 1,447.61</b>

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001            Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Childs, Robert F. Jr.</i>			
2/14/2007	RFC	Review and revision of form complaint (.50; meeting with Candis McGowan and Robert L. Wiggins re: changes to form complaint, various issues and work to be done (.75); conference with Candis McGowan re: her conversation with Hatchett and issues (.25)	1.50
4/16/2007	RFC	Review of various pleadings (1.0); conference with Candis McGowan re: update on issues (.50)	1.50
4/23/2007	RFC	Review of 30 (b) (6) Notice (.25); review of discovery (.25); conference with Candis McGowan re: same (.50)	1.00
4/24/2007	RFC	Review of deposition of Willie Marsh (1.0); further review of deposition (1.0)	2.00
4/25/2007	RFC	Review of e-mails re: discovery (.25); review of Charlie Baker deposition (1.50); review of Hatchett deposition (1.0)	2.75
4/30/2007	RFC	Review of Motion to Stay response by Webber	0.50
5/3/2007	RFC	Conference with Candis McGowan re: update	0.25
5/8/2007	RFC	Conference with Candis McGowan and Rusty Johnson re: depositions and notice from Tyson that they will not appear or provide witnesses (.50); review of Tyson Motions and conference with Candis McGowan re: same (.75)	1.25
5/11/2007	RFC	Review of pleadings re: response to Motion for Protective Order (.75); conference with Candis McGowan re: same	1.00
<b>Total</b>			<b>11.75</b>

**Wiggins, Childs, Quinn & Pantazis, P.C.**  
**Fee Application**

**018436-0001      Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<hr/>			
		<i>Hooks, Kimberly D.</i>	
		<hr/>	
11/4/2007	KDH	Compiled and prepared documents to be added to trial presentation. Available for technical assistance for users working on trial prep.	8.67
11/5/2007	KDH	Ran trial presentation software in trial. Assisted in making phone calls, copies, and locating documents for Attorneys.	13.25
11/6/2007	KDH	Ran trial presentation software in trial. Assisted in making phone calls, copies, and locating documents for Attorneys.	13.37
11/7/2007	KDH	Ran trial presentation software in trial. Assisted in making phone calls, copies, and locating documents for Attorneys.	12.80
11/8/2007	KDH	Ran trial presentation software in trial. Assisted in making phone calls, copies, and locating documents for Attorneys.	12.28
11/9/2007	KDH	Ran trial presentation software in trial. Assisted in making phone calls, copies, and locating documents for Attorneys.	7.82
<b>Total</b>			<b>68.19</b>

**Wiggins, Childs, Quinn & Pantazis, P.C.**  
**Fee Application**

**018436-0001      Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Johnson, Rusty N.</i>			
5/8/2007	RNJ	Conferences with Robert L. Wiggins, Robert F. Childs, and Candis M re: depositions of fact witnesses & corp. Representative. Re: three plaintiffs, and with Candis McGowan and Christine W re: filing required material with 11th Cir.	2.00
5/9/2007	RNJ	Conferences with Robert L. Wiggins and Candis M re: defendant's protective order, and assisting Candis M at depo to note objection to same on record.	1.00
			<b>Total</b> 3.00

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

018436-0001      Hatchett, Angela  
 Tyson Foods, Inc. (Albertville)

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
2/9/2007	CAM	Meeting on trial prep and responsibilities	0.80
2/12/2007	CAM	Receipt of email from Christine with settlement offers for each of the named plaintiffs and other information on settlement; attempting to reach Fox; attempting to reach Brothers; attempting to reach Hatchett; receipt of email from Christine regarding Mitchell rejected settlement; telephone call from Roger regarding settlement offers; conference call with Bob Wiggins, Bob Childs and Roger regarding settlement offers and legal issues; conference with Wiggins and Childs regarding issues raised by Roger; conference call with Joe Sellers, Wiggins and Childs regarding status of case, legal issues, etc	4.50
2/14/2007	CAM	Conference with Childs regarding legal issues in Alabama; research for Childs on Alabama legal issues; conference with Childs regarding results of research; conference with Wiggins and Childs regarding legal issues in Alabama, etc; telephone call with Angela Hatchett regarding status of case, trial date, and conveyed settlement offer, she said to reject the offer; voice mail message on number for M. H . Fox	2.80
2/15/2007	CAM	Conference call with Bob regarding electronic data needed in case; voice mail to Joe regarding question on payroll record data in Alabama; voice mail to Teresa Brothers last known contact numbers; telephone call from Teresa Brothers regarding conveyed settlement offer and status of the case, she will call back on Monday with response to settlement offer; drafting email to co-counsel regarding call with Teresa Brothers; drafting email to Christine regarding updated contract information for Brothers and Hatchett; telephone call from Christine regarding information on time records data from Albertville, status of tracking down M.H. Fox, my calls with Hatchett and Brothers, etc.; telephone call from Lisa Pederson regarding contacting Union representative.'s, issues with Alabama plants, issues with case due to Court's Order, etc	2.30
2/19/2007	CAM	Voice mail from Teresa Brothers regarding reject the settlement offer; telephone call to Teresa Brothers regarding confirming that she wants to reject settlement offer, trial date, sending her a copy of her deposition transcript; drafting email to co-counsel regarding Teresa Brothers wants to reject settlement offer; receipt of email from Joe Sellers regarding Brothers rejection of offer; telephone call to M. H. Fox regarding discussed status of case, trial date and conveyed offer of settlement, M. H. Fox would like to settle, but not for that amount; drafting email to co-counsel regarding M. H. Fox's response to settlement offer; receipt of email from Christine regarding status of plaintiffs' response to settlement offers; receipt of email from Jay	2.70

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001 Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		regarding when he expects to talk to his plaintiffs; receipt of email from Roger regarding Princess Brown rejected the offer of settlement	
3/8/2007	CAM	Voice mail to Christine regarding expert report deadlines	0.10
3/9/2007	CAM	Long telephone call from Christine regarding expert report for Fox, discovery in Alabama, scheduling Order in the cases, etc.; what needs to be done in the other cases, etc.; receipt of email from Christine regarding the supplemental discovery from three (3) Alabama plaintiffs; drafting email to Mueller regarding please change address on the Certificate of Service; drafting reply email to Mueller; drafting email to Childs regarding conference call; receipt of reply email from Childs;	1.50
3/15/2007	CAM	Telephone call with Christine regarding information on cases, expert report due in Fox today, etc.; receipt of email from Christine with expert reports for Fox, Hatchett and Brothers and reviewing the same; conference with Bob Wiggins regarding expert reports	1.00
3/20/2007	CAM	Telephone call from Christine regarding request from Mueller to take deposition of expert, possible dates, she will handle, etc.; telephone call from Christine regarding may attend the deposition	0.40
3/21/2007	CAM	Receipt of email from Christine with date and time for Expert witness, Schneider's deposition; drafting reply email to Christine; conference with Bob Childs regarding date of deposition of Schneider	0.30
3/27/2007	CAM	Conference with Bob Wiggins regarding discovery responses from Tyson and what needs to be done, etc.; telephone call from Buster regarding status of cases; voice mail to Christine regarding need discovery produced by Tyson; telephone call with Christine regarding results of deposition of Schneider, we need discovery produced by Tyson on named plaintiffs, etc	0.80
3/30/2007	CAM	Telephone call from Christine regarding sending emails with discovery responses, please forward to Bob Wiggins; telephone call with Bob Wiggins regarding discovery responses; receipt of email from Christine with Motion to Amend Protective Order; reviewing Motion to Amend Protective Order; drafting email to Christine regarding my thoughts on Motion; voice mail to Rusty regarding recent case on Protective Orders	1.30
4/2/2007	CAM	Receipt of email from Rusty with case on confidential orders; drafting email to Christine regarding case on Protective Orders; telephone call with Christine regarding Motion to Amend Protective Order	0.40

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001      Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
4/3/2007	CAM	Telephone call with Rick Kuykendall regarding status of cases, what needs to be done, etc	0.30
4/4/2007	CAM	Receipt of Federal Express package from Christine with personnel files of Fox, Brothers and Hatchett and reviewing same; receipt of email from Christine regarding Protective Order Motion	0.30
4/5/2007	CAM	Receipt of Motion to Intervene to Modify the Protective Order; receipt of email from Christine regarding Motion and other litigation issues	0.40
4/10/2007	CAM	Receipt of Order setting schedule for Tyson to respond to Motion to Intervene and Motion to Amend Protective Order	0.20
4/17/2007	CAM	Receipt of Motion for Extension of Time for Tyson to Respond to Motion to Amend Protective Order	0.20
4/24/2007	CAM	Editing 30(b)(6) deposition notices, voice mail to Bob Wiggins regarding deposition notice; executing 30 (b)(6) Notice for serving the same; receipt of fax letter from Mueller regarding defendant opposes any further discovery;	0.70
4/25/2007	CAM	Telephone call with Christine regarding need information and copy of 30(b)(6) Notice, Mueller's letter and position on discovery, etc.; drafting email to Christine with Mueller's letter; receipt of emails from Christine with Mueller's letter; receipt of emails from Christine with discovery responses; receipt of emails from Bob Wiggins regarding information needed for case; drafting reply emails to Bob Wiggins with requested information; conference with Bob Wiggins regarding status of discovery; executing deposition notices to Tyson; receipt of Tyson's responses to Modification of the Protective Order; voice mail to Christine	1.40
4/26/2007	CAM	Conference call with Bob Childs regarding depositions of supervisors	0.20
5/3/2007	CAM	Receipt of message from Bob regarding status of depositions next week; conference with Katrina regarding status of subpoenaing the supervisors, etc	0.20
5/4/2007	CAM	Executing subpoenas for supervisors' depositions; telephone call with process server regarding service of subpoenas	0.20
5/7/2007	CAM	Voice mail from process server regarding status of serving subpoenas; receipt of memo from process server regarding service of subpoenas and requests from one of the witnesses, Shelia Roden; telephone call to Shelia regarding accommodations she needs for the deposition; conference with Bob Wiggins regarding accommodations Shelia Roden needs, moving deposition due to	2.00

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001      Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		hearing; sending letter to Mueller regarding moving deposition; telephone call to Shelia Roden regarding moving her deposition to Friday, will send her a letter to confirm; conference with Bob Childs regarding status of deposition's and Notice from 11th Circuit on jurisdiction issue; drafting letter to Mueller regarding moving deposition of Shelia Roden	
5/8/2007	CAM	Preparing for depositions of supervisors; voice mail to Mueller regarding depositions; voice mail to David Smith regarding depositions; telephone call to Bob Wiggins regarding depositions and appeal forms, etc.; telephone call from Shelia Roden regarding problems with attending her deposition; conference with Rusty regarding depositions tomorrow; voice mail from Evangeline Pascal regarding Tyson will not be at the deposition; conference call with Bob Childs regarding Tyson's position on depositions; telephone call to Bob Wiggins regarding Tyson's position on deposition's in voice mail; conference with Rusty regarding depositions; receipt of email from Evangeline regarding not coming to depositions; telephone call from David Smith regarding not involved with depositions	7.10
5/9/2007	CAM	Receipt of Tyson's Motion and Supporting Brief for a Protective Order on the Depositions; conference with Bob Wiggins and Rusty regarding Tyson's position and our responses; attending the 30(b)(6) deposition to state our position on the record; reviewing Tyson's Brief; telephone call to Christine regarding Tyson's position and need copy of the January 2007 transcript; receipt of email from Christine with copy of the transcript and reviewing the same; receipt of email from Christine regarding PJC's help on the Briefs and conference call; telephone call from deposition witness, Brad Bigham, regarding Tyson attorneys told him to not to show up for deposition; conference with Bob Wiggins regarding depositions, reply to motion, PJC's offer, etc.; telephone call to Bingham regarding moving his deposition to Friday, drafting email to Christine regarding conference call times	6.70
5/10/2007	CAM	Editing and drafting response to Protective Order; conference call with Bob Wiggins, Christine and Debra Gardner regarding same; conference with Bob regarding response to Motion for Protective Order, our Motion to Compel, etc., and deposition of individuals; telephone call to Mr. Bingham regarding wait for ruling from the Court; drafting email to Christine regarding draft of reply for her review; receipt of email from Christine with her changes to draft; receipt of Orders to file under seal	6.10
5/11/2007	CAM	Editing Motion to Compel and Response to Motion for Protective Order; conference with Bob Childs regarding his changes to the Motion to Compel; making final revision to motion for e-filing the same; receipt of e-filed response and motion	2.00

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001 Hatchett, Angela  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<b><i>McGowan, Candis</i></b>			
5/14/2007	CAM	Receipt of filed under seal notices for Tyson's Motion for Protective Order in Fox, Hatchett and Brothers cases,	0.30
5/21/2007	CAM	Reviewing Defendant's Reply in Support of Motion for Protective Order; telephone call with Christine regarding Tyson's reply; conference with Bob Wiggins regarding Reply filed by Tyson	0.60
5/24/2007	CAM	Receipt of Tyson's responses and objections to document requests	0.30
5/29/2007	CAM	Receipt of Orders granting Motion to Quash Subpoenas and Deposition Notices; conference with Bob Childs regarding Orders	0.40
5/30/2007	CAM	Conference with Bob Wiggins regarding Judge's Order denying depositions, etc	0.20
7/17/2007	CAM	Receipt of email from Christine regarding none of the exhibits will need to be filed under seal, so she will e-file the Brief and Motion to Stay; drafting reply email to Christine regarding e-filing of Brief; receipt of e-filed Brief in Opposition to Tyson's Motion to Reconsider Denial of Summary Judgment; receipt of e-filed Motion to Stay; receipt of Tyson's Response to Motion to Stay and reviewing the same; voice mail to Christine regarding Tyson's response to Motion to Stay; voice mail to Bob Wiggins regarding response to Motion to Stay	1.00
8/1/2007	CAM	Receipt of Tyson's Motion to Reconsider Denial of Summary Judgment; drafting email to Bob Wiggins regarding Motion filed by Tyson; receipt of copy of Tyson's email to Judge Hopkins with courtesy copy of Motion	0.40
8/1/2007	CAM	Drafting email to Joe Sellers regarding Tyson's Motion	0.20
8/2/2007	CAM	Receipt of email from Joe regarding Tyson's Motion to Reconsider Denial of Summary Judgment; receipt of Order setting Briefing Schedule; receipt of email from Christine regarding conference call to discuss Reply Brief; drafting reply email to Christine regarding time for call; drafting email to Bob Wiggins regarding Order on briefing schedule; telephone call from Roger Doolittle regarding Order on Briefing Scheduling	0.90
8/3/2007	CAM	Receipt of email from Christine regarding response to Tyson's Motion to Reconsider Denial of Summary Judgment; reviewing Tyson's Motion to Reconsider; telephone call with Christine regarding responding to Motion, status of Cagles Petition for Rehearing, etc	0.90
8/5/2007	CAM	Reviewing Tyson's Motion to Reconsider and the Cagle's opinion for use in	1.30

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001      Hatchett, Angela  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		responding to the same	
8/6/2007	CAM	Conference with Bob Wiggins regarding Motion filed by Tyson, responding to same, Motion to Stay, etc; voice mail to Christine regarding Motion for Stay and responding to Motion; receipt of email from Christine with draft of outline for Reply Brief; telephone call with Christine regarding Reply Brief, legal arguments, filing Motion for Extension, etc.; voice mail to Bob Wiggins regarding conversation with Christine; receipt of email from Christine with draft of Reply Brief	1.10
8/7/2007	CAM	Conference with Bob Wiggins regarding conversation with Christine and outline for reply Christine prepared, Motion to Stay, etc.; drafting email to Christine regarding Bob Wiggins thoughts on the Motion to Stay; voice mail from Christine regarding Mueller agreed to extension; receipt of e-filed Motions for Extension to respond to Tyson's Motion to Reconsider Denial of Summary Judgment; conference with Bob Wiggins regarding motion filed by Christine; telephone call with Christine regarding responding to motion; motion to stay, assignment of work, her call with Mueller, etc.; reviewing Christine's outline for the Reply Brief	1.10
8/8/2007	CAM	Receipt of Order granting Extension to File Reply to Tyson's Motion to Reconsider; receipt of Bob Wiggins' Notice of Appearance; drafting email to Bob Wiggins with Order on Extension; receipt of email from Christine with draft of outline for Reply	0.60
8/9/2007	CAM	Telephone call with Christine regarding Reply Brief, Motion for Extension, etc.; receipt of e-mail from Christine to Robert Camp regarding legal arguments for the case; telephone conference with Bob Wiggins regarding emails	0.50
8/13/2007	CAM	Receipt of email from Christine regarding legal arguments and some potential issues; receipt of Bob Wiggins' reply email to Christine regarding the legal arguments	0.40
8/14/2007	CAM	Telephone call with Christine regarding status of Reply Brief, I will draft the Motion for Stay, etc.; telephone call to Bob Wiggins regarding questions on Reply Brief status, Motion to Stay, etc.; telephone call to Christine regarding Bob Wiggins' questions on legal arguments; receipt of email from Christine regarding information to use in Motion to Stay	0.60
8/15/2007	CAM	Working on Motion to Stay; receipt of email from Christine regarding questions on legal arguments Reply Brief; telephone call from Roger regarding Reply Brief status; receipt of email from Bob Wiggins to Christine regarding information for Reply Brief; receipt of Rusty's email to Christine with	1.70

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001 Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		information for Reply Brief; receipt of Bob Wiggins email to Christine; conference with Bob Wiggins; receipt of Christine's reply email to Bob Wiggins	
8/16/2007	CAM	Receipt of email from Christine regarding information for 3(o) issue; drafting and editing Motion to Stay; voice mail from Christine regarding she will contact Mueller about Stay; telephone call with Christine regarding Mueller's position on Motion to Stay, revising brief, etc.; receipt of email from Christine regarding revised Reply Brief for Opposition to Tyson's Motion to Reconsider Summary Judgment Denial; drafting email to Christine with draft to Motion to Stay for her review; receipt of email from Christine with her changes to Motion to Stay; editing Reply Brief, drafting email to Christine with my changes to Motion to Stay; telephone call to Christine regarding my changes to the Reply Brief, possible exhibits to file under seal with Reply Brief, she will e-file Motion to Stay and Reply Brief, etc	7.30
8/17/2007	CAM	Receipt of email from Christine regarding none of the exhibits will need to be filed under seal, so she will e-file the Brief and Motion to Stay; drafting reply email to Christine regarding e-filing of Brief; receipt of e-filed Brief in Opposition to Tyson's Motion to Reconsider Denial of Summary Judgment; receipt of e-filed Motion to Stay; receipt of Tyson's Response to Motion to Stay and reviewing the same; voice mail to Christine regarding Tyson's response to Motion to Stay; voice mail to Bob Wiggins regarding response to Motion to Stay	1.00
8/20/2007	CAM	Reviewing Tyson's response to the Motion to Stay; voice mail from Christine regarding replying to Tyson's response; receipt of email from Christine regarding call from Mueller on Pre-trial Order; receipt of Order setting hearing on Motion to Stay and Motion to Reconsider the Denial of Summary Judgment; telephone call with Christine regarding hearing on motions scheduled for next week, division of work assignments, response to Tyson's Opposition to Motion to Stay; Pre-trial Conference and date Joint Order is due contacting Tyson about Joint Motion to Continue Pre-trial conference due to pending motions, etc.; working on proposed Joint Pre-trial Order; telephone call from Roger Doolittle regarding order setting hearing on motions status of reply to opposition to stay, etc.; receipt of email from Christine regarding Tyson won't agree to move for continuance; drafting reply email to Christine regarding documents needed from her to prepare Pre-trial Orders	2.20
8/21/2007	CAM	Receipt of email from Christine with draft of Reply to Motion to Stay and editing the same; drafting email to Christine regarding Reply fine to file; receipt of e-filed Reply to Opposition to Stay	0.60
8/22/2007	CAM	Working on Pre-trial Order; drafting Brothers Pre-trial Order	1.50

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001 Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
8/23/2007	CAM	Receipt of email from Christine regarding copy of Mueller's email on Pre-trial Order and Joint Statement of Facts; drafting reply email to Christine regarding response to Mueller; receipt of Christine's email to Mueller regarding Joint Statement of Facts for Pre-trial Order; receipt of Order striking Reply Brief for Motion to Stay; drafting email to Chistine regarding order; receipt of email from Christine regarding questions on Order; drafting reply email to Christine regarding answers to her questions; working on Pre-trial Order; receipt of e-file corrected Reply Brief; receipt of Motion to file corrected Brief in Opposition to Summary Judgment denial	4.60
8/24/2007	CAM	Receipt of Order - mooting the striking of the briefs; working on the Pre-trial Orders; receipt of email from Christine regarding conference call; receipt of email from Bob Wiggins regarding conference call; receipt of email from Bob Wiggins regarding conference call; receipt of Tyson's response to our Opposition to Motion to Reconsider Summary Judgment; receipt of Tyson's email to Judge with copy of pleadings; voice mail from E. Pasqual regarding motion to file under seal; receipt of motion to file under seal	4.30
8/26/2007	CAM	Drafting proposed Pre-trial Order for Teresa Brothers	2.80
8/27/2007	CAM	Editing Brothers Pre-trial Order; voice mail to Christine regarding Pre-trial Order; drafting email to Christine with copy of proposed Pre-trial Order for her review; receipt of email from Christine regarding her suggested changes on the Pre-trial order; call with Christine regarding her changes to the Pre-trial Order, reasons for same, my additional changes, etc.; making final changes to Brothers Pre-trial Order; drafting Hatchett Pre-trial Order; drafting email to Christine and Bob Wiggins with copy of revised Pre-trial Order; receipt of email from Christine regarding legal arguments for Summary Judgment hearing; receipt of reply email from Bob Wiggins regarding his thoughts on Summary Judgement hearing; drafting Fox Pre-trial Order	5.30
8/28/2007	CAM	Drafting the Plaintiff's position for the Pre-trial Order in Hatchett; drafting e-mail to Christine with Order and reasons for the positions for her review; editing Fox' Pre-trial Order; drafting email to Christine with copy of Hatchett Pre-trial Order; receipt of email from Christine with her thoughts on Fox Pre-trial Order; receipt of email from Christine with her thoughts on Hatchett Pre-trial Order; telephone call with Christine regarding changes to the Pre-trial Orders, reasons for same, etc.; making final corrections to all three (3) Pre-trial Orders; receipt of email from Mueller with his proposed Pre-trial Order; drafting email to Mueller with our proposed Pre-trial Order; receipt of email from Mueller regarding his Pre-trial Order, receipt of reply email from Christine to Mueller; receipt of Order granting Motion to File Under Seal	5.90
8/29/2007	CAM	Voice mail from Mueller regarding time to talk; reviewing defendant's proposed	6.60

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001 Hatchett, Angela  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<b><i>McGowan, Candis</i></b>			
		Pre-trial Order; telephone call to Christine regarding issues with Mueller's proposed Narrative Statement, issues with Mueller's agreed facts, etc.; conference call with Christine to Mueller regarding proposed Pre-trial Order, what we can agree to, what we oppose, his position, etc.; receipt of email from Mueller with WordPerfect version of Orders to add Defendant's changes and positions; telephone call from David Smith regarding hearing tomorrow and problems I am having with computer in merging defendant's positions into Pretrial Order due to codes in their documents, etc.; telephone call from David Smith regarding agreement to email WordPerfect versions of the Pre-trial Order to the Court today and hand deliver hard copy tomorrow, etc; conference with Bob Wiggins regarding Pre-trial Order and hearing; drafting email to Judge Hopkins with copy of all three (3) Pre-trial Orders; preparing for hearing on motions; telephone call from Christine regarding hearings tomorrow and new issues, etc.; drafting letter to Hopkins regarding Pre-trial Order	
8/30/2007	CAM	Meeting with Christine regarding new legal arguments; preparing for and attending hearing on Tyson's Motion to Reconsider Summary Judgment and our Motion to Stay with Christine Webber; conference with Christine regarding results of hearing; receipt of Minute Entry from the clerk	7.10
8/31/2007	CAM	Telephone call from Roger regarding results of hearing; conference with Bob Childs regarding results of hearing yesterday; receipt of Order Denying Motion for Stay; receipt of Order partially granting Tyson's Summary Judgment on 3(o) issue	0.80
9/3/2007	CAM	Telephone call from Roger regarding Orders from Judge Hopkins on Motion to Stay and Motion on Summary Judgment	0.30
9/4/2007	CAM	Telephone call with Joe regarding hearing on Thursday, Court's Orders on Motion to Reconsider and Motion to Stay, Pretrial Conference , etc.; telephone call with Bob Wiggins regarding results of hearing, Orders and Pretrial; voice mail from Mueller's assistant regarding copy of Pretrial Orders; drafting email to Schiavo regarding copy of Pretrial Orders	0.70
9/5/2007	CAM	Receipt of email from Mueller regarding dates for Pretrial Order, receipt of email from Mueller regarding problems with font size in Pretrial Order, drafting reply email to Mueller regarding having his secretary correct same and send to me; drafting email to Mueller that our copies are in correct font	0.50
9/6/2007	CAM	Voice mail from Joe regarding Mueller's telephone calls; voice mail to Joe; regarding receipt of email from Mueller; conference call with Mueller and David Smith regarding dates for exchanging witnesses, voir dire, objections, etc.; preparing for the Pretrial Conference with Judge Hopkins; attending the Pretrial Conference with Judge Hopkins; receipt of email from Christine	4.10

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

018436-0001      Hatchett, Angela  
 Tyson Foods, Inc. (Albertville)

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		regarding case law for Judge Hopkins; drafting reply email to Christine; telephone call with Joe Sellers regarding settlement call from Mueller, results of Pretrial Conference, etc.; receipt of docket text notice of the Pretrial Conference.	
9/7/2007	CAM	working on Record for 11th Circuit; editing designation of the record for e-filing	1.00
9/9/2007	CAM	Receipt of email from Mueller with Schedule of due dates for Pretrial Order; reviewing drAsencigcase	0.50
9/10/2007	CAM	Receipt of email from Mueller's paralegal regarding letter about documents not produced and copies of new documents; reviewing new documents just produced by Tyson	0.50
9/11/2007	CAM	Conference with Bob Wiggins regarding notifying Judge Hopkins of de Asencio case; drafting email to Judge Hopkins and co-counsel with copy of de Asencio case	0.20
9/12/2007	CAM	Receipt of email from Joe regarding his settlement meeting with Mueller and need for a conference call; drafting email to Joe regarding time for conference call; receipt of email from Joe regarding confirming call number and time; conference call with Bob Wiggins and Joe regarding settlement talks with Mueller; legal issues with three trials, our possible responses, etc.; conference with Bob Wiggins regarding trial issues and responding to the Tyson's request, etc.	1.20
9/13/2007	CAM	Receipt of the Pretrial Order signed by Judge Hopkins in Fox, Hatchett, and Brothers; email from Joe Sellers regarding settlement and case law; receipt of Christine's reply email	0.40
9/14/2007	CAM	Voice mail to Joe Sellers regarding email from Mueller and settlement; receipt of email from Joe regarding scheduling conference call for Monday; preparing for trial and Damage Statement (attorneys fees), etc.; reviewing depositions to prepare Witness Lists	4.50
9/17/2007	CAM	Reviewing deposition transcript for witness names for use in the trial; drafting email to Joe Sellers regarding settlement proposal; telephone from Christine regarding proposal Joe is suggesting, my concerns with same, etc.; conference call with Bob Wiggins regarding Joe's proposal for settlement offer, our concerns, hours in case, etc.; telephone call with Christine regarding Bob Wiggins and my thoughts on settlement offer; telephone call from Christine regarding Joe's response to our concerns and reasons;	6.40

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001 Hatchett, Angela  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		conference with Bob Wiggins regarding Joe's thoughts and reasons for same; telephone call to Christine regarding Bob Wiggins' response for Joe, discovery responses needed for witness identification, etc.; telephone call to Lisa Pederson regarding witnesses needed from the UFCW she will have Renee contact me, etc; receipt of copy of Joe's email to Mike Mueller with the settlement offer; receipt of email from Christine with Amended Interrogatory Answers for Hatchett, Fox, Brothers	
9/18/2007	CAM	Working on Witness List; telephone call from Rene Bowser regarding witness needed from the Union to testify on de minimis issue; reviewing deposition testimony for Witnesses and Exhibits; drafting email to Joe Sellers regarding settlement discussions; calendaring dates from Pretrial Order; drafting email to Mueller regarding disputes with his outline of due dates from Pretrial Order; voice mail from witnesses reviewing deposition transcripts	6.80
9/19/2007	CAM	Voice mail to Katrina regarding documents needed from the file for Exhibit List; receipt of email from Mueller regarding response to my email with questions on his deadline outline; voice mail from Renee Bowser regarding witness name and contact information; voice mail to Renee regarding witness information; conference call with Bob regarding witness preparation, exhibits for trial, deposition to use, trial strategy, etc.; drafting email to Joe regarding trial questions; conference call with Joe and Christine regarding information from Mueller, questions on previous depositions, trial strategy, etc.; reviewing depositions for use in trial; working on Witness List; attempting to locate witnesses; working on Exhibit List; telephone call with Christine regarding additional depositions needed from them, information for damage calculations, etc.; reviewing Expert's Reports for use in calculating damages; conference with Bob Wiggins regarding information from Joe and Christine and Expert Reports	9.40
9/20/2007	CAM	Working on locating witnesses for trial; voice mail to the President of the Nashville local regarding need copy of CBA and address for Union Representative; working on Exhibit List; working on Witness List; working on Damage Statement; receipt of email from Christine and her paralegal; telephone call with Greg Stallings, UFCW Local 1995 President, regarding information needed for the case; reviewing depositions for exhibits; editing Witness and Exhibit Lists; drafting and editing Damage Statement; drafting email to Bob with Damage Statement	10.60
9/21/2007	CAM	Telephone call with Dian regarding email to Bob with Damage Statement; conference with Bob Wiggins regarding Damage Statement; conference with Bob Wiggins regarding Damage Statement and his suggested charges to the same; editing Damage Statement; conference with Lisa Sandlin regarding calculation of prejudgment interest; receipt of email from Mueller regarding	7.30

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001 Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		disclosures due today and method of exchanging same; editing Witness List and Exhibit List; drafting email to Mueller regarding my understanding of what is due today under the Pretrial Order; drafting email to Christine with copy of the Damage Statement for her review; conference with Lisa Sandlin regarding calculation of prejudgment interest and the amount; telephone call with Christine regarding her changes to the Damage Statement and her additions to the Witness and Exhibit Lists; receipt of email from Christine with copy of new exhibit; receipt of email from Christine with the transcript; preparing the designations of the deposition pages for witnesses; making final corrections to the Witness and Exhibit Lists and Damage Statement for e-filing; conference with Bob Wiggins regarding his approval and suggested changes for the pleadings; receipt of e-filed copies of Damage Statement and Witness and Exhibit Lists	
9/23/2007	CAM	Receipt and review of Tyson's Witness List, Exhibit List and Deposition Designations	0.40
9/24/2007	CAM	Reviewing Tyson's Exhibit Lists in Fox, reviewing Tyson's Witness List in Fox and reviewing Tyson's deposition designation to prepare objections to the same; receipt of email from Christine regarding call from court reporter about 8/30 hearing transcript; drafting reply email to Christine regarding transcript of hearing	0.70
9/25/2007	CAM	Voice mail to Christine; voice mail from Christine; telephone call with Christine regarding email from Mueller and his objections to our exhibits and witnesses, etc	0.50
9/26/2007	CAM	Receipt of email from Mueller with attached letter outlining his objections to our deposition designations, working on Witness List in Brothers' case; working on Exhibit List in Brothers' case; reviewing depositions for use in Brothers case; voice mail to Christine regarding objections to Tyson's Lists and Objections to our Lists in Fox; telephone call with Christine regarding objections for Fox case, settlement call Joe had with Mueller, etc; conference call with Christine to M. H. Fox regarding trial date, damages now due to recent court ruling, authority for settlement offer, etc; telephone call with Christine regarding interrogatory responses needed my position on witnesses, etc.; receipt of email from Christine regarding interrogatory responses; receipt of Order in Fox on narrative testimony; voice mail from Renee Bowser regarding witnesses for trial	10.10
9/27/2007	CAM	Working on Exhibit List for Brothers; reviewing the information from Brothers deposition for use in calculating damages; editing and drafting Witness List; drafting Damage Statement; voice mail to Christine; reviewing Tyson's Objections in Mueller's letter; drafting and editing Objections to Tyson's	11.50

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001      Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		Exhibit List; drafting Objections to Tyson's Deposition Designations and drafting our Counter Deposition Designations; telephone call with Christine regarding Objections to Tyson's Exhibit and Deposition Designations and her changes to the same; receipt of evil copies of Brothers pleadings on Fox Objections; receipt of Tyson's Witness List, Exhibit List and Deposition Designations in Brothers	
9/28/2007	CAM	Editing Witness List for Brothers; editing Brother's Exhibit List; reviewing documents for additional exhibits; calculating Brothers' damages; telephone call to Christine regarding information for damages; preparing objections to Tyson's Exhibit in Fox; drafting email to Christine with Brothers pleadings for her review; telephone call with Christine regarding the changes to Brothers Witness and Exhibits List and Statement of Damages; Objections to Fox Exhibits listed by Tyson and objection to Tyson's deposition designations in Fox; editing all pleadings; preparing objections to Tyson's Deposition Designations and Counter Designations in Fox; receipt of e-filed Tyson's Witness List, Exhibit List, and Deposition Designation in Brothers; receipt of Objections in Fox by Tyson, Receipt of our e-filed pleadings	11.60
10/1/2007	CAM	Reviewing Tyson's Witness and Exhibit Lists in Brothers; receipt of email from Mueller on Objections filed in Fox; telephone call to Christine regarding email from Mueller and my response to the same; drafting reply email to Mueller regarding Pretrial Order says to serve and file objection in Fox, then meet and confer, etc; receipt of reply email from Mueller regarding his position on Pretrial Order; receipt of Christine's reply email to Mueller regarding why his position is wrong; drafting email to Mueller and David Smith regarding dates Christine and I are available to meet and confer in Fox; receipt of email from Mueller's office regarding scheduling date for conference call to meet and confer; telephone call from Mueller and McIntosh regarding filing Motion for Leave to file Tyson's objections out of time, our position on same; telephone call with Christine regarding call from Mueller; conference call with Christine to McIntosh regarding our position; telephone call with Dan Bartel regarding dates for his testimony for each case; working on subpoenas; preparing for trial in Fox	5.40
10/2/2007	CAM	Conference with Bob Wiggins regarding status of cases, what needs to be done for trial, etc; receipt of email from Mike McIntosh with proposed Motion for Leave to File Objections Out of Time and reviewing the same; telephone call to Christine regarding my problems with proposed motion; receipt of Christine's email with draft of response to Mueller on Motion; conference with Katrina regarding subpoenas; drafting reply email to Christine regarding draft is fine; receipt of email from Christine to Mueller regarding our problems with his motion; receipt of email from Mueller regarding the damages we claim in Fox and Brothers; receipt of Christine's reply email to Mueller; telephone call with Bob Wiggins to Dan Bartel; telephone call from Mueller; conference call	3.80

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001 Hatchett, Angela  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		with Mueller and Christine regarding his proposal on Motion, his problems with our damages, documents he has not produced, etc.; receipt of email from Mueller with new draft of Motion for Leave to File Out of Time and editing the same; telephone call with Christine regarding our problems with new draft, conference call with Christine and Mike; working on Exhibit and Witness List for Hatchett; receipt of Tyson's e-filed Motion for Leave to File Objections in Fox out of time	
10/3/2007	CAM	Working on Hatchett Witness and Exhibit Lists; conference with Bob Wiggins regarding jury charges, depositions for trial, etc.; receipt of email from Mueller regarding pay records for Brothers, Hatchett, and Fox; receipt of Order granting Tyon's Motion for Leave to file Objections out of time in Fox; telephone call with Dan Bartel regarding information for his testimony and location of trial; conference with Bob Wiggins regarding line time claims for Fox; receipt of Bob's email to Christine on line time claims; receipt of reply email from Christine to Bob Wiggins; working on Hatchett Damage Statement	4.90
10/4/2007	CAM	Working on Hatchett Witness and Exhibit Lists	0.50
10/4/2007	CAM	Receipt of narrative testimony in Hatchett	0.10
10/4/2007	CAM	Working on Hatchett Damage Statement	1.00
10/4/2007	CAM	Receipt of email from Mueller with Damage Calculations	0.10
10/4/2007	CAM	Receipt of email requesting street address for Brothers.	0.10
10/5/2007	CAM	Voice mail to Christine regarding Hatchett Damage Statement	0.10
10/5/2007	CAM	Editing Hatchett Witness and Exhibit Lists	2.70
10/5/2007	CAM	Editing Hatchett Damage Statement	2.70
10/7/2007	CAM	j	4.80
10/8/2007	CAM	Telephone call with Christine re: objections to counter-deposition designations, telephone call with Mueller, our objections she drafted, etc.	0.30
10/8/2007	CAM	Conference call with Bob Wiggins regarding our positions on objections, conference call with Mueller, trial preparation,etc.	0.30
10/8/2007	CAM	Conference call with Mueller, Chrisitne and Bob Wiggins regarding meet and	3.80

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001 Hatchett, Angela  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<b><i>McGowan, Candis</i></b>			
		confer on Fox objections, meet and confer on Motions in Limine, discussions on subpoenas for clients, etc.	
10/8/2007	CAM	Conference with Bob Wiggins re: Motions in Limine	0.30
10/8/2007	CAM	Telephone call with trial witnesses, etc and preparing for trial	1.00
10/9/2007	CAM	Receipt of email from Robert L. Wiggins re: information for Fox jury charges	0.10
10/9/2007	CAM	Voice mail from Christine	0.10
10/9/2007	CAM	Receipt of email from Christine re: video tape of Phillips deposition, etc.	0.10
10/9/2007	CAM	Receipt of Notice of Filing transcript of August 30th hearing	0.10
10/9/2007	CAM	Receipt of email from Christine with copy of 3rd Circuit Opinion denying Tyson's Motion for Rehearing in DeAsencio	0.10
10/9/2007	CAM	Drafting email to Christine and Robert L. Wiggins re: time for Brothers' conference call on Thursday	0.10
10/9/2007	CAM	Receipt of reply email from Christine	0.10
10/9/2007	CAM	Conference with Robert L. Wiggins re: conference call and witness information.	0.10
10/9/2007	CAM	Drafting email to Mueller re: conference call time	0.10
10/9/2007	CAM	Receipt of reply email from Mueller re: confirming call	0.10
10/9/2007	CAM	Telephone call from Dan Bartel re: confirming call	0.20
10/9/2007	CAM	Telephone call from David Smith re: Chris Mitchell filing Notice of Appearance	0.20
10/10/2007	CAM	Receipt of Bob's email to Christine regarding jury charges; voice mail from Bob Wiggins regarding questions on jury charges; receipt of Bob's email to Mueller on jury charges; conference with Bob regarding jury charges, voir dire and damages; receipt of Mueller's reply email regarding status of him providing proposed jury charges; receipt of letter from Mueller with copy of Tyson's exhibits for Fox case; receipt of email from Mueller with copy of proposed jury instructions and verdict form; drafting email to Christine regarding conference to talk about Mueller's proposed jury charges; drafting	4.80

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001      Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<b><i>McGowan, Candis</i></b>			
		Voir Dire; reviewing Mueller's proposed charges and verdict form; receipt of email from Bob with changes to Mueller's Pretrial information to jury; conference call with Bob and Dan Bartel; receipt of email from Mueller regarding refusing to agree to accept trial subpoenas and putting witnesses on call; receipt of email from Christine regarding Mueller's refusal to put witnesses on call; drafting reply email to Christine; reviewing Judge Hopkins' website for her standard Voir Dire and editing our Voir Dire to comply with the same; attempting to contact witnesses	
10/11/2007	CAM	Telephone call with Bob Wiggins regarding jury charges and Motions in Limine; conference call with Christine, etc; receipt of email from Bob Wiggins with his proposed changes to Tyson's jury charges; editing changes Bob made; drafting email to Christine regarding jury charges; telephone call to Christine regarding changes she wants to make to jury charges; preparing objections to Tyson's Exhibit Lists in Hatchett; preparing Objections to Tyson's Deposition Designations in Hatchett; telephone conference with Bob regarding changes to jury charges; conference call with Christine, Bob Wiggins and Mueller regarding meet and confer and jury charges; telephone conference with Christine regarding voir dire and jury charges; reviewing exhibits to send to Mueller; drafting email to Mueller; telephone call with Janette Masters regarding subponeas for her testimony; telephone call with Teresa Brothers; telephone call with Angela Hatchett; receipt of email from Bob Wiggins regarding Motions In Limine; receipt of email from Christine; editing Hatchett objections; telephone call from Bob Wiggins regarding jury charge research; receipt of Notice of Appearance of Chris Mitchell; editing Voir Dire questions; drafting email to Christine with draft of objections in Hatchett to Tyson's exhibits; telephone call with witnesses; drafting Counter-Deposition Designations in Hatchett	11.10
10/12/2007	CAM	Editing Hatchett Objections to Deposition Designations; receipt of e-filed copy of Hatchett Objections to Deposition Designations and Objections to Exhibits of Tyson; receipt of Tyson's Objections in Hatchett	0.50
10/12/2007	CAM	Receipt of email from Christine regarding objections to Exhibits; receipt of Bob Wiggins emails on jury charges; receipt of Christine's reply emails; receipt of emails to Mueller regarding dropping the 2 minute production line claim for Fox; receipt of Mueller's reply email; receipt of time computer disks for time records from Albertville; conference with Bob Wiggins regarding Motions in Limine, jury charges, etc.; reviewing case law for jury charges; drafting email to Mueller regarding Motions in Limine we are filing; receipt of reply email from Mueller regarding conference call on same; editing Voir Dire; editing Motion in Limine on use of deposition testimony; receipt of Order granting Notice of Appearance for Mitchell; conference call with Mueller and Bob Wiggins regarding jury charges and Motions in Limine; editing Motions in Limine; conference call to clerk left voice mail regarding extension; drafting	11.00

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001      Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		counter-depositions objections for Brothers; telephone call with Christine regarding conference call, Motion in Limine, etc., telephone call from Judge Hopkins' clerk regarding have until Monday at 9:00 to file jury charges; drafting email to all attorneys regarding extension on jury charges; making final corrections on Motions in Limine for filing; receipt of e-filed versions of our motions; receipt of Tyson's Motions in Limines in Fox; telephone call with Bob Wiggins regarding jury charges and Motions in Limine responses; receipt of email from Mueller regarding telephone number for weekend work on jury charges	
10/13/2007	CAM	Downloading Tyson's Briefs and Evidentiary Submissions in Support of Motions in Limine and the Motions in Limine; telephone conference with Bob Wiggins regarding jury charges; Motions in Limine, etc.; drafting emails to Bob Wiggins with copies of Motions and Briefs; receipt of email from Mueller regarding damages; reviewing Tyson's Motions in Limine and working on responses	3.50
10/14/2007	CAM	Telephone call with Dian regarding jury instructions; telephone call with Bob Wiggins regarding information needed, Motions in Limine, etc; telephone conference with Dian regarding additional information needed by Bob Wiggins; receipt and review of Bob's email to Mueller regarding proposed jury instructions; receipt of email from Mueller regarding his problems with our draft of jury instructions; telephone call with Bob regarding Mueller's email; drafting reply email to Mueller regarding our position on jury charges and suggestions to correct his perceived problems; receipt of reply email from Mueller; drafting reply email to Mueller; receipt of email from Mueller regarding thinks we have a compromise; working on responses to Motions in Limine; receipt of email from Christine regarding the response she is drafting; drafting reply email to Christine regarding argument to add to her response; drafting response to Motion in Limine on Yarbrough testimony; drafting response to Motion in Limine on Witnesses; receipt of order on Voir Dire; drafting email to Judge Hopkins to send Voir Dire; voice mail from Janette Masters; telephone call to Janette	9.30
10/15/2007	CAM	Telephone call with Dian regarding Mueller filed Joint Proposed Jury Charges last night; receipt and review of filed Joint Proposed Jury Charges; receipt of Mueller's email regarding reason he filed before sending final draft to us to review; telephone conference with Bob regarding jury charges Mueller filed without our review, status of Oppositions to Motions in Limine, etc.; drafting and editing Fox Opposition to Motion in Limine on Witnesses Not Disclosed and Opposition to Motion in Limine on Yarbrough Testimony; telephone call with Christine regarding information needed for Oppositions; telephone call from Judge Hopkins' law clerk regarding copy of transcript from May 28, 2003 hearing; drafting email to Christine regarding transcript; conference call with Bob regarding Oppositions to Motion in Limine; telephone call from Judge's	12.20

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001      Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		court reporter regarding daily copy of trial transcript; drafting email to Judge Hopkins' clerk regarding attaching/hearing transcript she requested; working on witness subpoenas; telephone call with Judge Hopkins' docket clerk regarding questions on Exhibit labels; telephone call with Christine regarding oppositions to MIL; receipt of Christine's Opposition to Motion to Limine for filing; drafting email to Christine with my Opposition for her review; receipt of email from Christine regarding her changes; making final corrections to Oppositions for filing; receipt of email from Christine with Brothers Unresolved Objections for filing; receipt of e-filed copies of Fox Oppositions and Brothers Unresolved Objections; receipt of copy of Tyson's Oppositions to Fox's Motion in Limine; receipt of copy of Tyson's Unresolved Objections in Brothers; telephone call with M.H. Fox regarding trial preparation, appointment, etc.; receipt of order granting Motion to Seal; receipt of copies of emails to Judge Hopkins with WordPerfect versions of the pleadings filed today	
10/16/2007	CAM	Receipt of email from Joe regarding daily copy of trial transcript; receipt of email from Bob regarding daily copy; conference with Bob regarding meeting with Fox and witness information, etc.; document numbers, etc; telephone call from Cecil Maldanodo regarding his testimony for case; telephone call with M. H. Fox regarding meeting tomorrow and transportation arrangements, etc.; receipt of email from Mueller regarding witness issue in Fox; receipt of email from Mueller regarding meet and confer in Hatchett; preparing outline of Fox's testimony	1.50
10/17/2007	CAM	Voice mail from Mueller regarding meet and confer on Hatchett, etc.	0.10
10/17/2007	CAM	Conference call with Bob Wiggins to Mueller regarding Hatchett meet and confer, trial issues, time to exchange demonstrative, etc	0.30
10/18/2007	CAM	Working on voir dire for Brothers; receipt of various email from Mueller and Bob's response.	1.50
10/19/2007	CAM	Telephone call with Christine regarding expert report issues; preparing Hatchett Objections to Tyson's Counter and Deposition Designations; drafting email to the Court with a copy of unresolved objections; receipt of e-filed pleadings and various emails from Mueller	3.60
10/24/2007	CAM	Conference with Angela Hatchett regarding her trial and claims, etc.; reviewing exhibit books for defendants and objections books for the Judge	0.80
10/27/2007	CAM	Drafting emails to Christine regarding Hatchett MIL responses	0.30

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001                    Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<b><i>McGowan, Candis</i></b>			
10/28/2007	CAM	Receipt of email from Christine with responses to MIL in Hatchett; editing Hatchett MIL responses.	0.60
11/2/2007	CAM	Preparing for Hatchett trial; telephone calls to witnesses regarding trial testimony and dates; conference with Bob Wiggins regarding trial witness order and strategy; working on demonstratives; drafting email to Judge Hopkins with clock demonstrative; receipt of various emails from Mueller regarding defendant's demonstratives; receipt of emails from Christine regarding jury charges; receipt of emails from Bob Wiggins and Christine regarding trial strategy; receipt of filed jury verdict for Brothers	9.80
11/3/2007	CAM	Preparing for trial; telephone call to witnesses; meeting with Angela Hatchett to prepare; receipt of Orders; receipt of Motions in Limine from Tyson; preparing responses to Motion in Limine, conference with Bob Wiggins	11.80
11/4/2007	CAM	Preparing for trial; telephone calls with witnesses; receipt of Motion in Limine; drafting response to Motion in Limine; receipt of Orders on pending Motions; preparing exhibits based on Orders; telephone calls with Bob Wiggins regarding Orders; telephone call to Angela; emails to Christine, etc.; receipt of emails from Mueller regarding damages	11.10
11/5/2007	CAM	Preparing for and attending first day of Hatchett trial; receipt of e-filed Brothers' Motion for Judgment; telephone conference with Christine regarding issues for trial for her to research, etc.; telephone conference with Christine regarding video tape issues; preparing for 2nd day of trial; receipt of docket minute entry; receipt of briefing schedule; telephone conference with Roger; receipt of email from Renee; reviewing Tyson's time records for cross of Phillips	14.80
11/6/2007	CAM	Preparing for and attending second day of Hatchett trial; reviewing video tapes; conference call with Bob Wiggins regarding trial strategy and preparing for 3rd day of trial; telephone call with Christine regarding preparation of response to video, Schneider deposition, etc.; telephone conference with Bob Wiggins regarding strategy for third day of trial	16.40
11/7/2007	CAM	Meeting with Bob Wiggins and Angela Hatchett regarding preparing for trial; preparing for and attending 3rd day of trial for Hatchett; telephone conference with Christine regarding response for Tyson's Opposition to Collateral Estoppel Claim; video issues, results of trial; conference with Bob Wiggins regarding strategy for 3rd day of trial; reviewing video's for counter designations; preparing for 4th day of trial	17.40
11/8/2007	CAM	Preparing for and attending 4th day of trial in Hatchett; oral arguments on Motion for Collateral Estoppel based on Brothers verdict; charge conference	16.60

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001 Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		with Judge; preparing for closing; conference with Bob Wiggins regarding rebuttal and closing; preparing for last day of trial; preparing for closing argument	
11/9/2007	CAM	Preparing for and attending the final day of Hatchett trial and obtaining jury verdict; telephone call to Christine regarding verdict	10.00
11/13/2007	CAM	Receipt of Christine's email to Mueller regarding Motion to Extend Time to File Fee Petition and any objections from Tyson; receipt of Mueller's reply email regarding dates it would be due; receipt of reply email from Christine to Mueller; receipt of Order on Hatchett Judgment	0.40
11/15/2007	CAM	Receipt of Christine's email on Motion for Fees, her thoughts on same, etc; receipt of Bob's reply email to Christine regarding his thoughts on Fee Petition motion; receipt of reply email from Christine; receipt of email from Christine regarding needs me to draft Motion for Extension and to contact Evangeline about defendant's position; drafting Motion for Extension of Time to File Fee Petition; drafting email to Christine with draft of motion for her review; telephone call to Christine regarding motion and her changes; telephone call to Evangeline regarding defendant's position on the motion; receipt of email from Evangeline with defendant's position; conference with Bob Wiggins regarding Tyson's request on Rules 58/49; drafting email to Evangeline regarding our position on Rule 58/59 motions; receipt of reply email from Evangeline regarding file motions as unopposed; e-filing motion; drafting email to Judge	2.70
11/26/2007	CAM	Working on Fee Petition; receipt of email from Christine regarding information for Fee Petition	1.10
11/29/2007	CAM	Receipt of email from Evangeline regarding Tyson's Request for Extension to File its Appeal	0.10
11/30/2007	CAM	Telephone call with Bob Wiggins regarding Reply Motion	2.10
12/3/2007	CAM	Working on fee petition	3.50
12/3/2007	CAM	Working on Fee Petition; receipt of e-filed Opposition to Tyson's Motion to Extend Time to Appeal	3.50
12/4/2007	CAM	Receipt of Order Denying Motion to Extend Time to File Appeal; editing time and calculating time and expenses for Fee Petition; editing Fee Petitions; receipt of e-filed Fee Petitions	10.50

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001 Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
12/5/2007	CAM	Telephone call from Judge's office regarding conference call with the Judge and time for the same; conference call with Bob Wiggins regarding call with Judge; conference call with Judge Hopkins, Bob Wiggins and David Smith regarding pending motion for fees and the Judge's thoughts and questions on same; drafting email to Christine regarding Judge's questions on Fee Petition	0.50
12/6/2007	CAM	Receipt of transcript from the Court Reporter	0.20
12/13/2007	CAM	Receipt of Notice of Appeal; receipt of transcript from Court Reporter for November 11, 2007; receipt of Order deferring ruling on attorneys' fees	0.50
12/18/2007	CAM	Receipt of USCA case number	0.10
12/19/2007	CAM	Receipt of Notice from the 11th Circuit regarding docketing of case and case number; conference with Dian regarding Notice of Appearance	0.30
12/20/2007	CAM	Receipt of Transcript Request by Tyson for appeal	0.20
12/26/2007	CAM	Receipt of Order from 11th Circuit regarding Brief on Jurisdiction of Tyson's Appeal	0.20
12/28/2007	CAM	Drafting email to Bob regarding Order from 11th Circuit on Brief on Jurisdiction Question	0.10
1/2/2008	CAM	Conference with Bob Wiggins regarding Jurisdiction Questions from 11th Circuit; receipt of email from Christine regarding jurisdiction issues; receipt of Bob's email on jurisdiction issues; drafting reply email on due date on Brief, voice mail to 11th Circuit docket clerk regarding due date of Briefs; receipt of email from Christine with legal research and reviewing the same; telephone call with 11th Circuit Mediator regarding request to combine Mediation with Brothers case; conference with Bob on combining Mediations; telephone call with 11th Circuit docket clerk in Brothers case regarding mailing rule for due date for Brief on jurisdiction issues; drafting email to Bob Wiggins, Christine and Joe regarding due date of Brief and mailing rule; telephone call to Mueller regarding 11th Circuit's jurisdictional questions and due date for the briefs, status of transcripts for appeal and request from 11th Circuit Mediation to combine Brothers and Hatchett cases for one mediation, etc.; drafting email to Bob Wiggins, Christine and Joe regarding my conversation with Mueller; telephone call with Christine regarding conversation with Mueller, one combined Mediation, Mediation Statement, draft of brief on jurisdiction issues, etc	2.10
1/3/2008	CAM	Conference with Bob Wiggins regarding Mueller's position on combined	1.30

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001 Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		Mediation, etc.; telephone call with Christine regarding Answer to 11th Circuit questions on jurisdiction, etc.; receipt of email from Christine with copy of draft of Answer to 11th Circuit jurisdictional questions and reviewing the same; receipt of Bob's email to Christine with his changes to Answer on questions; receipt to filing of transcripts by the Court Reporter	
1/7/2008	CAM	Receipt of copy of plaintiff's response to jurisdictional questions; conference with Bob Wiggins regarding response filed by Christine	0.20
1/9/2008	CAM	Receipt of memo from 11th Circuit regarding electronic document filing I.D. and date Tyson's brief is due; calendaring due date for Tyson's brief	0.30
1/15/2008	CAM	Voice mail to Bill Roland, 11th Circuit Mediator; telephone call to Bill Roland regarding combining the Hatchett Mediation with the Brother's Mediation, Mediation Statement, etc.; conference with Bob Wiggins regarding Tyson has agreed to consolidate the Mediation of the 2 cases, etc.; drafting email to Court Reporter regarding confirming transcript we received are the official transcripts.	0.70
1/18/2008	CAM	Receipt of letter from 11th Circuit Mediator regarding Mediation Statement due date; working on Statement	1.00
1/22/2008	CAM	Drafting and editing Mediation Statement; telephone call to Christine regarding information needed for the Mediation Statement; drafting email to Bob and Christine with Statement for their review; receipt of email from Christine with her changes; editing Mediation Statement; conference with Bob regarding file Statement; drafting email to 11th Circuit Mediator regarding Hatchett's Mediation Statement	2.80
1/23/2008	CAM	Voice mail from Mediator Davies regarding his questions for Mediation; telephone call to Caleb Davies regarding past settlement offers and additional information he needs, etc.; telephone call with Christine regarding information Mediator needed; drafting email to Davies regarding requested information; receipt of Judge Hopkins Order entering Final Judgment; receipt of transmittal Notice to 11th Circuit; preparing for Mediation	1.40
1/24/2008	CAM	Conference with Bob regarding Mediation and his thoughts on same; participating in 11th Circuit Mediation Assessment call with Mediator Davies	0.50
1/25/2008	CAM	Receipt of Tyson's designation of materials for inclusion in the record; drafting email to Bob and Christine regarding Tyson's designation; receipt of Tyson's Notice of Appeal from the Final Judgment	0.50

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001      Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
1/28/2008	CAM	Receipt of e-notice of transmission of Notice of Appeal	0.10
1/31/2008	CAM	Voice mail from Mueller regarding Motion to Consolidate; conference with Bob regarding Mueller's voice mail; telephone call to Mueller regarding Motion to Consolidate appeals; we don't oppose if briefing schedule due to our schedule, etc.; Mueller's issues with schedule, will not oppose any extension request; voice mail to Bob regarding issues raised by Mueller; receipt of email from Mueller with proposed Motion to Consolidate and reviewing the same; telephone call with Christine regarding Mueller's request and her position on Motion to Consolidate; voice mail from Mueller's secretary regarding Motion to Consolidate; telephone call to Mueller regarding our position on Motion to Consolidate, can't agree to move date of brief, etc	1.10
2/4/2008	CAM	Voice mail from Christine regarding 11th Circuit called about Motion to Consolidate; telephone call with Christine regarding Motion to Consolidate and call from the 11th Circuit, our position on same, etc.; conference with Katrina on Record Designation; receipt of Christine's email on Record Designations; research on 11th Circuit Rules on Appendix, drafting email to Mueller regarding date our designations are due and 11th Circuit Rules; receipt of Notice of Appeal fees paid by Tyson; receipt of Notice of docketing Appeal from 11th Circuit; receipt of Notice from 11th Circuit with Appeal case number	1.50
2/5/2008	CAM	Receipt of Notice of Tyson's Second Order of Transcripts for trial	0.10
2/6/2008	CAM	Receipt of email from Christine regarding 11th Circuit's call on Motion to Consolidate; conference with Bob Wiggins regarding position on Motion to Consolidate; drafting reply email to Christine regarding our position on Motion to Consolidate; conference with Bob Wiggins regarding letter from Mueller on designation of record for appendix and our position; receipt of Bob's email to Mueller regarding R-301 of 11th Circuit prohibits his documents for appendix; receipt of Mueller's reply email to Bob	0.70
2/7/2008	CAM	Receipt of Bob's email to Mueller regarding documents not proper for appendix	0.10
2/11/2008	CAM	Receipt of Order from 11th Circuit granting Motion to Consolidate; receipt of Notice from 11th Circuit with Electronic Pin Number and briefing schedule	0.30
2/13/2008	CAM	Receipt of court reporter's notice that transcript is complete	0.10
3/3/2008	CAM	Conference with Bob regarding dates briefs are due; drafting email to Mueller regarding dates briefs are due; receipt of email from Mueller regarding due	0.40

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001 Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		date	
3/4/2008	CAM	Receipt of email from Christine regarding appeal brief due dates	0.10
3/10/2008	CAM	Receipt of email from Mike McIntosh regarding Defendant is going to file Motion to Consolidate appeal with Brothers, will we oppose same; receipt of email from Christine regarding McIntosh's email and Tyson's position; drafting reply email to Christine and Bob regarding my thoughts on why to oppose; receipt of Bob's email regarding his questions and thoughts; receipt of Christine's reply email; drafting email to Christine and Bob regarding additional thoughts on motion; receipt of Bob's reply email; conference with Bob regarding our position; drafting email to Christine regarding Bob and I oppose Motion	0.80
3/11/2008	CAM	Receipt of email from Christine regarding agrees with our position; telephone call with Christine regarding notifying Tyson of our position; receipt of Christine's email to McIntosh regarding we oppose the Motion to Consolidate the Appeal with Brothers	0.40
3/17/2008	CAM	Receipt of Motion to Consolidate Appeal with Brothers	0.20
3/19/2008	CAM	Receipt of Certificate of Interested Person and Corporate Disclosure Statement	0.20
3/24/2008	CAM	Preparing response to Motion to Consolidate Appeals; draft email to Bob with draft	3.40
3/26/2008	CAM	Telephone call with Bob Wiggins regarding Opposition to Motion to Consolidate due tomorrow; Christine's thoughts on same, our response, etc.; receipt of Bob's email to Christine and Joe with copy of Brothers Opposition and thoughts for Hatchett case; receipt of Christine's reply email to Bob; receipt of Bob's reply email to Christine regarding our position on Opposition	0.50
3/27/2008	CAM	Receipt of email from Bob Wiggins with draft of Opposition of Motion to Compel and reviewing the same; telephone call with Bob Wiggins regarding Opposition is fine with me; receipt of Christine's email regarding her thoughts on Opposition; telephone conference with Katrina regarding Opposition has been filed	0.60
4/1/2008	CAM	Conference with Bob Wiggins regarding Fee Petition	0.30
4/4/2008	CAM	Receipt of Notice from 11th Circuit clerk regarding court has jurisdiction to consider appeal	0.20

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001            Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
4/11/2008	CAM	Telephone conference with Katrina regarding date the Fee Petition is due, what needs to be done for same, information Bob Wiggins needs for Petition, etc.; telephone call to Bob Wiggins regarding due date for Fee Petition, what needs to be done, etc.; telephone call to Katrina regarding information that Bob Wiggins needs for working on the Fee Petition, where located, etc.; telephone call to Bob Wiggins regarding confirming he received the information, etc.	0.90
4/14/2008	CAM	Conference with Bob Wiggins regarding Fee Petition and how the hours are to be divided between the 3 cases, etc.; editing Motion for Fees; calculating time and expenses; telephone call with Christine regarding confirming information for her fees; making final corrections to Motion for Fees and Expenses; receipt of e-filed Motion for Fees and Expenses	4.50
4/18/2008	CAM	Receipt of email from Mueller regarding Tyson is dismissing appeal and he suggests handling fees with Fox Petition; conference with Bob Wiggins regarding email and proposal; telephone call with Christine regarding email and proposal	0.30
5/8/2008	CAM	Receipt of email from Mueller with Preliminary Objections to our Request for Fee Petition; receipt of email from Christine regarding her thoughts on Tyson's objections; receipt of Bob Wiggins' reply email to Christine regarding Motion to Compel; conference with Bob Wiggins regarding objections; drafting email to Christine regarding Fee Petition and amending the same	0.80
5/10/2008	CAM	Receipt of email from Mueller regarding status of Motion to Compel; forwarding email to Bob Wiggins	0.10
5/19/2008	CAM	Telephone call from Angela Hatchett regarding explained status of Tyson withdrawing appeal, amount she will receive, etc.; receipt of Order from 11th Circuit dismissing appeals; receipt of email from District Court regarding appeal dismissed	0.50
5/22/2008	CAM	Receipt of Order setting briefing schedule on Motion to Compel	0.10
5/27/2008	CAM	Receipt of email from Dian regarding the deadlines for Motion for Fees; receipt of Order from 11th Circuit dismissing the appeal; receipt of efiled Notices from District Court of 11th Circuit's Order; receipt of letter from Christine with Fee Petition documents	0.60
6/3/2008	CAM	Conference with Bob Wiggins regarding Brief for Fees and affidavits; conference with Bob Childs regarding declarations for Fee Petition; receipt of Bob Childs' email to Bruce Rogers with information on Fee Petition for	1.00

**Wiggins, Childs, Quinn & Pantazis, P.C.**  
**Fee Application**

**018436-0001 Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>McGowan, Candis</i>			
		affidavit; telephone call from Bob Childs regarding questions on history of case for briefing for Fee Petition, etc.; receipt of email from Bob Childs with affidavit draft; receipt of emails from Bob Childs to other counsel for affidavits	
6/4/2008	CAM	Working on Brief and documents for Fee Petition; voice mail to Bruce Rogers; telephone call with Bruce Rogers regarding his affidavit, information about case, etc	0.80
6/5/2008	CAM	Receipt and review of Defendant's Opposition of Plaintiff's Motion to Compel Production of Defendant's Fee Payments and Itemization of time	0.30
6/10/2008	CAM	Working on Declarations and Brief for Fee Petition; telephone call with Christine regarding she will handle the Reply to Tyson's Opposition to Motion to Compel	5.60
6/13/2008	CAM	Working on Brief for Fee Petition; conference with Bob Wiggins regarding Brief; conference with Rusty regarding his assignments on Brief; telephone call with Christine regarding her Fee Petition, changes she needs to make to same, etc.; conference with Bob Childs regarding Whatley declaration; telephone call from Roger regarding Fee Petition Declaration	6.10
6/14/2008	CAM	Working on Evidentiary Submission for Fee Petition; drafting Brief, drafting Affidavits, etc.	5.80
6/15/2008	CAM	Drafting my declaration; editing time records for last 2 months; drafting and editing brief to support Fee Petition, etc	9.50
<b>Total</b>			<b>485.70</b>

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001 Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Washington, Katrina</i>			
8/15/2007	KW	Conference with Candis regarding finding Collective Bargaining Agreement and locating the same	0.30
9/14/2007	KW	Witness and Exhibit List - locate personnel files and other documents needed for the Witness and Exhibit List	0.50
9/19/2007	KW	Locate deposition of named plaintiffs and documents produced by Tyson Foods	1.00
9/20/2007	KW	Locate documents listed on plaintiffs and defendant's witness and exhibit list	1.50
9/21/2007	KW	Plaintiff's Witness and Exhibit List - Go through personnel files and other documents for exhibits	1.20
10/1/2007	KW	Telephone conference with Candis regarding Hatchett's Witness and Exhibit List	0.20
10/1/2007	KW	Reply email from Candis regarding use names on Witness and Exhibit list for witnesses	0.10
10/1/2007	KW	Draft email to Candis re: serving subpoenas; locate witnesses, etc.	0.10
10/1/2007	KW	Draft subpoenas (12), draft supplemental sheet with subpoenas; locate addresses for subpoenas; preparing all trial subpoenas	7.00
10/2/2007	KW	Locate witnesses for subpoenas; receipt of list from Candis regarding who we are serving with subpoenas; telephone call to clerk regarding amount for mileage fees and witnesses fees for subpoenas; calculate mileage fees telephone call to Rhett Wood regarding serving subpoenas	7.00
10/3/2007	KW	Calculate mileage fees for witnesses; draft email to Sharon re: mileage fees; draft email to Sharon re: checks for mileage and witness fees preparing documents for trial	5.00
10/4/2007	KW	Conference with Candis regarding Hatchett exhibits; locate exhibits for Hatchett's case	1.50
10/5/2007	KW	E-file Witness and Exhibit List for Hatchett; Deposition Designations	0.30

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

018436-0001      Hatchett, Angela  
 Tyson Foods, Inc. (Albertville)

Date	Atty	Description	Hours
<i>Washington, Katrina</i>			
10/12/2007	KW	Conference with Candis regarding our Objections to Tyson's Trial Exhibits are ready to be e-filed; e-file our Objections to Tyson's Trial Exhibits; Edit our Objections to Tyson's Deposition Designations; e-file our Objections to Tyson's Deposition Designations	3.00
10/15/2007	KW	Trial preparation - subpoenas, Motion in limine to Exclude Evidence of Pre-shift Activities, Motion in Limine to Exclude Lay Witness Testimony and Preclude Plaintiff from calling Witnesses Whose Identities Were Not Properly Identified; Brothers Statements of Unresolved Objections; make corrections to all motions and e-file to the U.S. District Court and email to all counsel and U.S. District Court Judge Hopkins	3.17
10/19/2007	KW	Hatchett - Prepare notebook for Judge Hopkins; and Candis; Hatchett objections to defendant Deposition Designations	4.80
10/20/2007	KW	Receipt of Jerry Fernandez Expert Deposition	8.90
10/25/2007	KW	Preparation for Brothers trial, get exhibit notebooks for defendant and defense counsel.	3.80
11/2/2007	KW	Hatchett - Exhibit labels, responding to Motion in Limine; receipt of Brothers transcript	5.10
11/2/2007	KW	Preparing for Hatchett trial; prepare plaintiff's Exhibit List for courtroom deputy; receipt of various emails regarding our demonstrative exhibits; prepare trial exhibit notebooks and gather other items we may need for trial	5.10
11/3/2007	KW	Hatchett trial preparation - finalize trial notebooks, pleading notebooks, conference with copy center regarding copies; receipt of email from Judge Hopkins regarding our demonstrative exhibits; draft email to Christine regarding demonstrative exhibits; conference with Dian regarding demonstrative exhibits and opening/closing statement exhibits; receipt of various emails from Mr. Wiggins and Mueller regarding claims in case; receipt of email from Christine to Judge Hopkins regarding our demonstrative exhibits; conference with Dian regarding contacting court reporter to see if she can provide us with the a trial transcript; draft email to court reporter regarding is the trial transcript was ready; receipt of email from court reporter regarding the transcript is not ready yet; receipt of email to Judge Hopkins regarding Notice of Intent Not To Offer Or Use Deposition of Dr. Schneider and Opposition To Defendant's Offer of Parts of Such Deposition and Notice Regarding Retention of Wilfulness Claim; organize files and gather documents we need for trial	10.30
11/4/2007	KW	Hatchett trial preparation; receipt of email to Judge Hopkins of Plaintiff's	8.50

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001 Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Washington, Katrina</i>			
		Response in Opposition re [159] Motion in Limine to Allow Use of Videotape Segments Without Playing Entirety of Videotapes; receipt of various email between plaintiff's counsel; receipt of email regarding Hatchett's deposition testimony; conference with copy center regarding copies; receipt of email regarding Plaintiff's Opposition to Defendant's Motion in Limine Regarding "Pre-shift Activities" and Continuance of Trial; receipt of email regarding Plaintiff's Notice of Withdrawal of Willfulness Claim; receipt of Order denying [174] Motion in Limine "re" Admissibility of Deposition Testimony and Tables of Stephen Schneider; making necessary copies for trial; organize pleading notebooks and other documents we need for trial	
11/5/2007	KW	Hatchett trial - Voir Dire - Openings Statement	13.30
11/6/2007	KW	Hatchett trial - plaintiff's case in chief; pull documents as needed	13.40
11/7/2007	KW	Hatchett trial preparation and attending trial; plaintiffs case in chief, pull documents as needed	12.80
11/8/2007	KW	Preparing for and attending fourth day of trial in Hatchett; receipt of trial transcript via email; receipt of Defendant's Motion to Alter Order of Closing Arguments; receipt of Plaintiff's Opposition to Defendant's Motion to Alter Order of Closing Arguments; receipt of email from Dian regarding court reporter fee and putting our runner on notice regarding picking up items from the courthouse	12.00
11/9/2007	KW	Preparing for and attending last day of trial; jury reached a verdict in our favor	8.50
11/12/2007	KW	Conference with Candis regarding entering time and our Fee Petition	0.20
11/30/2007	KW	Receipt of email from Dian Jemigan regarding Judge Hopkins entered Order stating our reply to defendant's motion to extend time for appeal is due on Monday, December 3, 2007	0.10
12/3/2007	KW	Conference with Dian regarding client matter number for Mr. Wiggins time entry; draft email to Cheryl regarding pulling my time; conference with Candis regarding entering time and filing Fee Petition; correcting and editing my time for Fee Petition	3.50
12/3/2007	KW	Receipt of Plaintiff's Opposition to Extension of Time To File Appeal	0.10
12/3/2007	KW	Editing time entries for fee petition	0.50
12/4/2007	KW	Enter and correct time for fee petition	0.50

**Wiggins, Childs, Quinn & Pantazis, P.C.**  
**Fee Application**

**018436-0001      Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Washington, Katrina</i>			
12/13/2007	KW	Receipt of Order from Judge Hopkins regarding deferring ruling on attorneys' fees until after appeal; organize and put in pleadings notebook; receipt of Notice of Appeal; receipt of e-filing of appeal fee paid by defendant	0.20
12/19/2007	KW	Receipt of U.S. Court of Appeals letter to Mike Mueller regarding information regarding appeal and court giving us our electronic filing number; make copy of letter for my file; make labels for file and pleadings; conference with Candis regarding asking Dian if she will complete the Appearance of Counsel Form for the Hatchett case; telephone call to Dian regarding if she will complete the Appearance of Counsel form or does she need me to do it; reply she will have it done by tomorrow at the latest	0.30
		<b>Total</b>	<b>143.77</b>

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001      Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Wiggins, Ann K.</i>			
10/3/2007	AKW	Research model jury instructions and FLSA instructions for Robert L. Wiggins. Search other districts and circuits model jury instructions. Discuss with Robert L. Wiggins.	2.00
10/5/2007	AKW	Research on various issues for pretrial motions including duty to designate under FRCP 30(b)(6), number of persons who can be designated, read practice treatises and cases. Meet and Discuss with Robert L. Wiggins.	3.00
11/7/2007	AKW	Discuss research issues with Robert L. Wiggins, research collateral estoppel and jury verdicts, Reynolds footnotes and similar cases.	4.25
11/8/2007	AKW	Travel to and attend trial, discuss instructions and closing with Robert L. Wiggins, meet with attorneys and clients.	10.00
			<b>Total</b>
			<b>19.25</b>

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001      Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Wiggins, Robert L.</i>			
2/9/2007	RLW	Meeting on trial prep and responsibilities; discuss status of discovery; read depositions	2.80
2/10/2007	RLW	Read depositions to determine trial prep and discovery issues	4.00
2/11/2007	RLW	Read depositions and discovery to plan trial preparation	3.50
2/12/2007	RLW	Outline trial prep; outline client's facts	5.20
2/13/2007	RLW	Read depositions and outline trial prep issues	3.70
2/20/2007	RLW	Review status of discovery; outline trial issues needing further work	2.00
4/24/2007	RLW	Review and outline discovery to date; outline further discovery needed; draft 30(b)(6) deposition notice; identify supervisors that need to be deposed; draft deposition notices; discuss trial prep work to be done with co-counsel; draft several e-mails on work to be done	8.50
4/25/2007	RLW	Meeting on trial prep with co-counsel; further review of discovery and documents produced to date by Tyson	5.50
6/27/2007	RLW	Several meetings on trial prep with co-counsel; outline witnesses needed for trial	2.50
8/21/2007	RLW	Several meetings on trial prep and division of labor for trial prep; prepare for pretrial conference; outline issues for pretrial order	5.30
8/29/2007	RLW	Meeting on trial prep and pretrial conference issues; prepare for court conference	3.00
8/30/2007	RLW	Meeting in preparation for pretrial conference and trial preparation; work on trial prep; outline division of labor/things to be done	2.00
9/6/2007	RLW	Prepare for and attend pretrial conference; outline results of pretrial conference and work that needs to be done; read Tim McCoy deposition and outline useable parts	6.20
9/7/2007	RLW	Outline witnesses and documents to be used at trial; review discovery document production for possible trial exhibits; meeting on trial prep; e-mails	4.00

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001      Hatchett, Angela  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Wiggins, Robert L.</i>			
		on various issues	
9/8/2007	RLW	Read and outline useable parts of Whitney Wilson deposition; read and outline Serrano deposition for possible designations	8.30
9/9/2007	RLW	Read and outline possible deposition designations from Schneider; study expert reports of both parties; outline useable parts	9.20
9/10/2007	RLW	Read and outline Dr. Fernandez deposition and report for defendant for possible trial designations and/or cross/exam at trial	12.20
9/12/2007	RLW	Teleconference on settlement; meeting on trial preparation with co-counsel	2.00
9/13/2007	RLW	Continue work on Dr. Fernandez's deposition and cross-exam outline and possible deposition designations; read and outline depositions of defendants' officials for designations on pages pursuant to pretrial order	8.50
9/15/2007	RLW	Read and outline depositions of defendants' officials and expert in order to decide what pages to designate/counterdesignate for trial	6.40
9/17/2007	RLW	Meeting on trial prep; continue trial prep	2.50
9/19/2007	RLW	Meeting on trial prep	1.00
9/20/2007	RLW	Meeting on trial prep and witnesses/document lists and other due dates	2.10
10/2/2007	RLW	Outline Jerry Phillips' deposition as part of trial exam; outline for Phillips; meeting with co-counsel on trial prep	6.80
10/3/2007	RLW	Research and draft jury instructions and various motions in limine issues; study and outline defendant's position in pretrial order; draft e-mail; trial prep; meeting with co-counsel on trial prep	10.70
10/4/2007	RLW	Outline Phillips' deposition and cross-exam outline; work on jury instructions and various motions in limine; meeting on trial prep	12.00
10/5/2007	RLW	Continue trial exam; outlines; integrate documents/exhibit references into outlines work on jury instructions and motions in limines; e-mails to and from Tyson's counsel; trial prep meeting	11.40
10/6/2007	RLW	Read and outline defendant's depositions; continue work on Phillips' exam outline; outline useful exhibits; study backpay calculations; overall trial prep	9.00

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001      Hatchett, Angela  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Wiggins, Robert L.</i>			
10/7/2007	RLW	Trial prep; outline Phillips' deposition and trial exam areas; outline Roderick Jackson's deposition	7.40
10/8/2007	RLW	Continue work on trial exam outline of Jerry Phillips; work on Roderick Jackson's deposition and exam outline; study collective bargaining agreement; meeting on motion in limine and jury instructions; teleconference with defense counsel; meet with co-counsel on trial prep issues; draft and respond to various e-mails on trial prep issues	13.30
10/9/2007	RLW	Continue trial prep and witness exam outlines; work on jury instructions and motions in limine; study DOL regulations	12.50
10/10/2007	RLW	Talk to clients; talk to potential witnesses; work on motions in limine; draft jury instructions from review of DOL regulations; draft and respond to various e-mails; outline direct exams of clients; outline new parts of Jerry Phillips exam; study D'Ascencio transcript and outline parts	13.50
10/11/2007	RLW	Continue work on motion in limine and jury instructions; teleconference with co-counsel; study parts of D' Asencio transcripts; continue work on trial witness cross-exam outlines	9.50
10/12/2007	RLW	Re:-draft and respond to defendant's proposed jury instructions; discuss jury instructions with other counsel; draft and edit motions in limine and various e-mails; overall trial prep; read some of cases cited by defendant on jury instructions	13.00
10/13/2007	RLW	Revise and respond to jury instructions; study defendant's motion in limine; outline response to defendant's motions in limine; continue trial prep; outline direct exam of potential witnesses; prepare for Dr. Fernandez cross-exam.; work on backpay calculations; outline parts of defendant's exhibits; study plaintiff's punch-in/punch-out records; outline potential problem areas in client's depositions; work on jury instructions again	12.00
10/14/2007	RLW	Revise jury instructions in light of communications with defendant counsel; continue work on trial witness exam outlines; study punch-in/punch-out records for use at trial	10.60
10/15/2007	RLW	Revise outlines for trial; review response on motions in limine; outline points of reply on motions in limine; review version of jury instructions sent to court; draft revised motion in limine on Harper/Roden 30(b)(6) issue in light of defendant's brief on that issue; outline cross-exam of Phillips as Company spokesman; meeting on trial prep; continue overall trial prep	13.20

# Wiggins, Childs, Quinn & Pantazis, P.C.

## Fee Application

**018436-0001      Hatchett, Angela  
Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Wiggins, Robert L.</i>			
10/16/2007	RLW	Work on Phillips' cross-exam outline; outline direct exam topics for plaintiffs; overall preparation for trial on all three cases; meetings with co-counsel on trial prep issues	13.80
10/17/2007	RLW	Continue trial preparation and cross-exam outlines; several meetings on trial preparation; work on demonstrative exhibits; review parts of videotapes and defendant's orientation DVD	12.70
10/18/2007	RLW	Work on Fernandez' cross exam outline; work on witnesses cross-exam outline based on various exhibits and deposition extracts; work on punch-in/punch-out records for use at trial; overall trial prep; work on courtroom electronics and slide show; draft and respond to e-mails; study motions in limine brief and responses; study defendant's trial exhibits; draft demonstrative exhibit disclosure; work on demonstrative exhibits	13.00
10/19/2007	RLW	Revise motions in limine; continue trial prep and review of defendant's trial exhibits; draft objection to defendant's expert and motion to exclude; teleconference with court; respond to court's orders and requests entered from teleconference; review items being submitted to court; work on electronic aspects of blow-ups; revise parts of cross-exam outline of Phillips	14.20
10/20/2007	RLW	Work on cross-exam outlines; get exhibit blow-ups; several teleconferences with defense counsel; meeting with co-counsel on trial prep; rework direct exam outlines; draft opposition to defendant's demonstrative exhibits; further review of defendant's trial exhibits	10.00
10/21/2007	RLW	Work on electronic presentation of trial exhibits and deposition extracts; meet with Kim Hooks on trial exhibits and Phillips' deposition extracts; revise and edit trial exam outlines for Jerry Phillips; draft various e-mails; draft opening statement outline; work on direct exam points for Fox	8.00
10/26/2007	RLW	Draft motion in limine; revise motion in limine	3.50
11/2/2007	RLW	Meeting on trial preparation; outline Hatchett's deposition; outline direct exam of client; draft and respond to various e-mails; rework cross-exam outline for Phillips to include his testimony from Brothers' trial; work on demonstrative exhibits; overall trial prep	12.50
11/3/2007	RLW	Meet with client; draft notice of intent on Schneider; draft motion on wilfulness; continue work on revising trial exam outlines for various witnesses; work on Hatchett's punch-in/punch-out records; work on opening statement; overall trial prep; teleconference with co-counsel on wilfulness issues and others; draft e-mails on wilfulness issue	13.00

**Wiggins, Childs, Quinn & Pantazis, P.C.**  
**Fee Application**

**018436-0001      Hatchett, Angela**  
**Tyson Foods, Inc. (Albertville)**

Date	Atty	Description	Hours
<i>Wiggins, Robert L.</i>			
11/4/2007	RLW	Outline client's direct exam questions; prepare for trial draft response to motion in limine on pre-shift claim; meet with co-counsel; outline and review opening statement; draft and respond to various e-mails; draft notice to court on wilfulness claim; read stream of orders on motions, objections, etc.	13.30
11/5/2007	RLW	Prepare for and attend trial; select jury; meet with client; revise opening statement outline; revise cross-exam outline of Phillips overnight to include punch-in/punch-out records and issues; meet with witnesses; prepare for second day of trial	16.00
11/6/2007	RLW	Prepare for and attend trial; meet with client; meet with witnesses; work on videotapes; prepare for next day's witnesses at night	15.00
11/7/2007	RLW	Prepare for and attend third day of trial; meet with clients and witnesses; work on next day's witnesses and issues at night; study videotapes and related issues	15.50
11/8/2007	RLW	Prepare for and attend trial and charge conference; prepare for final day of trial and closing argument	14.00
11/9/2007	RLW	Prepare for and attend fifth day of trial; meet with clients	9.00
11/14/2007	RLW	Meeting on fee request	0.50
12/3/2007	RLW	Review time in case; draft fee affidavit	3.50
			<b>Total</b> 452.80
			<b>Total</b> 1,184.46

**Wiggins, Childs, Quinn & Pantazis, LLC (B'ham)**

The Kress Building  
 301 19th Street North  
 Birmingham, AL 35203

June 16, 2008

Ms. Angela Hatchett  
 1695 LeCroy Drive  
 Altoona, AL  
 35952

Matter ID: 018436-0001

RE: Tyson Foods, Inc. (Albertville)  
 EXPENSES

	Photocopy	5,724.20
10/26/2007	Katrina Washington, 10/08/07 to 10/21/07 OT	1,099.39
10/26/2007	Fax	4.00
10/26/2007	Color Copies	90.00
10/27/2007	Witness Fee	95.00
	Dorothy Harvell (Check No. 13520)	
10/29/2007	Courier	134.80
	Tommy Gilreath (Check No. 13558)	
10/29/2007	Color Copies	15.75
10/29/2007	3" Binder"	14.00
10/29/2007	3" Binder"	14.00
10/30/2007	Postage	0.41

**Wiggins, Childs, Quinn & Pantazis, LLC (B'ham)**

10/31/2007	Research Expense: West Law: 10/01/07 - 10/31/07	354.05
10/31/2007	Research Expense: West Law: 10/01/07 - 10/31/07	223.74
10/31/2007	Travel Expense: West Law: 10/01/07 - 10/31/07	221.00
10/31/2007	Research Expense: West Law: 10/01/07 - 10/31/07	2,749.40
10/31/2007	Research Expense: West Law: 10/01/07 - 10/31/07	2,779.69
10/31/2007	Research Expense: West Law: 10/01/07 - 10/31/07	1,467.97
11/1/2007	Mileage Expense	48.00
	Ann K. Wiggins (Check No. 14603)	
11/1/2007	Mileage Expense	96.00
	Robert L. Wiggins Jr. (Check No. 14760)	
11/2/2007	Travel Expense	36.59
	Kimberly Hooks (Check No. 13572)	
11/2/2007	Mileage Expense	116.40
	Kimberly Hooks (Check No. 13572)	
11/2/2007	Courier	54.40
	Tommy Gilreath (Check No. 13558)	
11/2/2007	Courier	54.40
	Tommy Gilreath (Check No. 13558)	
11/5/2007	Transcript Expense	275.10
	Chanetta Sinkfield (Check No. 13597)	
11/5/2007	Transcript Expense	1,816.70
	Chanetta Sinkfield (Check No. 13597)	

**Wiggins, Childs, Quinn & Pantazis, LLC (B'ham)**

11/8/2007	Comb Binding	6.00
11/9/2007	Telephone - Litigation	16.61
	Kimberly Hooks (Check No. 13650)	
11/9/2007	Kim Hooks, 10/08/07 to 11/4/07 OT	1,441.26
11/9/2007	Mileage Expense	341.60
	Katrina Washington (Check No. 13676)	
11/9/2007	Travel Expense	65.56
	Katrina Washington (Check No. 13676)	
11/9/2007	Courier	54.40
	Tommy Gilreath (Check No. 13652)	
11/9/2007	Mileage Expense	290.76
	Kimberly Hooks (Check No. 13650)	
11/9/2007	Travel Expense	47.96
	Kimberly Hooks (Check No. 13650)	
11/9/2007	Courier	54.40
	Tommy Gilreath (Check No. 13652)	
11/9/2007	Katrina Washington 10/22/07 to 11/4/07 OT	2,181.67
11/9/2007	Tommy Gilreath, 10/15/07 to 11/4/07 OT	177.82
11/14/2007	Comb Binding	6.00
11/15/2007	Comb Binding	8.00
11/21/2007	Katrina Washington, 11/5/07 to 11/18/07 OT	619.89

**Wiggins, Childs, Quinn & Pantazis, LLC (B'ham)**

11/21/2007	Kim Hooks, 11/5/07 to 11/18/07 OT	613.27
11/21/2007	Tommy Gilreath, 11/5/07 to 11/18/07 OT	19.91
11/27/2007	Photocopy Expense	1,700.00
	IKON Office Solutions - IMS - 10097 (Check No. 14179)	
11/30/2007	Research Expense: West Law: 11/01/07 - 11/30/07	562.15
12/7/2007	Katrina Washington, 11/19/07 to 12/01/07 OT	25.25
12/21/2007	Katrina Washington 12/3/07 to 12/16/07 OT	5.81
1/10/2008	Comb Binding	4.00
1/10/2008	Tabs	3.60
1/28/2008	Fax	3.00
2/7/2008	Transcript Expense	800.10
	Chanetta Sinkfield (Check No. 14364)	
3/31/2008	Research Expense: Pacer: 01/01/08 - 03/31/08	2.48
4/21/2008	Photocopy Expense	38.45
	IKON Office Solutions - IMS - 10097	
<b>TOTAL EXPENSES</b>		<b>\$ 26,574.94</b>